

In re: Weyerhaeuser & 3M Company, et al.

Transcript of the Video Deposition of:

Janet Pecher

June 30, 2015



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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WISCONSIN

BOYER V. WEYERHAEUSER COMPANY, ET AL.
W.D. WI CASE 3:14-CV-286
HECKEL V. 3M COMPANY, ET AL.
W.D. WI CASE 3:13-CV-459
MASEPHOL V. WEYERHAEUSER COMPANY, ET AL.
W.D. WI CASE 3:14-CV-186
PECHER V. WEYERHAEUSER COMPANY, ET AL.
W.D. WI CASE 3:14-CV-147
PRUST V. WEYERHAEUSER COMPANY, ET AL.
W.D. WI CASE 3:14-CV-143
SEEHAFER V. WEYERHAEUSER COMPANY, ET AL.
W.D. WI CASE 3:14-CV-161
SYDOW V. WEYERHAEUSER COMPANY, ET AL.
W.D. WI CASE 3:14-CV-219
JACOBS V. 3M COMPANY, ET AL.
W.D. WI CASE 3:12-CV-899

VIDEO DEPOSITION OF JANET PECHER

Video deposition examination of JANET
PECHER, taken at the instance of the Plaintiffs,
under and pursuant to Rule 30 of the Federal Rules of
Civil Procedure and the acts amendatory thereof and
supplementary thereto, pursuant to Notice upon the
parties, before Monica M. Hunkins, RPR, a Notary
Public in and for the State of Wisconsin, at the
Holiday Inn, 750 South Central Avenue, Marshfield,
Wisconsin, on the 30th day of June, 2015, commencing
at 9:10 a.m. and ending at 11:48 a.m.

1 A P P E A R A N C E S

2

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ALSO PRESENT: Connie Hansen, videographer.

23 The original transcript of the video
24 deposition of JANET PECHER was filed with Attorney
25 Mitch McGuffey.

I N D E X P A G E

E X A M I N A T I O N

PAGE

JANET PECHER

EXAMINATION BY MR. MCCOY.....	6
EXAMINATION BY MR. MCGUFFEY	24
EXAMINATION BY MR. BROWN.....	99
EXAMINATION BY MR. MCGUFFEY	115

E X H I B I T S

MARKED

Exh. 1	Photograph.....	5
Exh. 2	Photograph.....	5
Exh. 3	Amended Notice of Deposition of....	7
	Janet Pecher	
Exh. 4	Plaintiff's Response to	18
	Weyerhaeuser Interrogatories	
Exh. 5	Job History	37
Exh. 6	Medical Record - 6/7/13	65
Exh. 7	Medical Record - 7/23/13	71
Exh. 8	Urban Pecher Exposure Summary.....	89
Exh. 9	Letter to Robert McCoy from Frank .	93
	Parker dated 1/29/15	
Exh. 10	Letter to Robert McCoy from Henry .	93
	Anderson dated 1/30/15	

(The originals of the above exhibits were included in the original transcript, and copies thereof were included with transcript copies, as requested.)
Electronic pdf files of the exhibits were also provided to counsel, as requested.)

O B J E C T I O N S

PAGE LINE

BY MR. MCCOY	92	21
BY MR. MCCOY	92	23

1 BY MR. MCCOY 105 13

2 -----

3 P R O D U C T I O N R E Q U E S T S

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P R O C E E D I N G S

(Deposition Exhibit Nos. 1 and 2 marked for identification.)

THE VIDEOGRAPHER: We are on the record at 9:10 a.m. on June 30th, 2015. This is Volume No. 1, Media Unit 1, of the video deposition of Janet Pecher taken by the plaintiff in the matters of Boyer versus Weyerhaeuser Company, et al., and all other cases listed on the notice, filed in the United States District Court for the Western District of Wisconsin. This deposition is being held in Marshfield, Wisconsin.

My name is Connie Hansen, and I'm the videographer appearing on behalf of Gramann Reporting with offices in Milwaukee, Wisconsin. The court reporter is Monica Hunkins of Gramann Reporting.

Would counsel now please state their appearance and affiliation for the record, beginning with the plaintiff.

MR. MCCOY: Yes. Bob McCoy for the plaintiffs.

MR. BROWN: Kevin Brown here for 3M Company.

MR. MCGUFFEY: Mitch McGuffey on behalf

of Weyerhaeuser Company.

THE VIDEOGRAPHER: Would the --

MR. WATSON: Brian Watson representing Owens-Illinois.

THE VIDEOGRAPHER: Would the court reporter please swear in the witness.

THE COURT REPORTER: Ma'am, would you raise your right hand.

(Witness sworn.)

THE WITNESS: I do.

MR. MCCOY: Okay. Let's begin by --

THE VIDEOGRAPHER: Can you put your mike on, though.

MR. MCCOY: Yeah, sure.

JANET PECHER, after having been first duly sworn, was examined and testified as follows:

EXAMINATION BY MR. MCCOY:

Q. Begin by introducing yourself. And what I'd like you to do is to give us your full name and spell your last name for us.

A. Okay. Janet Ann Pecher, P-E-C-H-E-R.

Q. And where do you live now, Ms. Pecher?

A. 402 North Peach Avenue, Marshfield, Wisconsin, 54449.

Q. And this is a deposition in a -- in a -- in

a case which -- it's in several cases, but one of the -- the cases concerns your deceased husband, Urban Pecher.

A. Yes.

Q. Is that your --

A. Yes.

Q. -- understanding?

MR. MCCOY: Okay. For the record, we should mark this Exhibit 1. It's a notice of the deposition. You can pass that over.

THE COURT REPORTER: Sir, this is 3.

MR. MCCOY: 3? Okay. You're ahead of me.

(Deposition Exhibit No. 3 marked for identification.)

BY MR. MCCOY:

Q. All right. So for -- we've marked as Exhibit No. 3 the notice for today's deposition.

Now, I'd like you to first start by going back in time and just telling us about your background, where you were born and who your parents were and when you were born. Go ahead.

A. Okay. I was born in Marathon County, Wisconsin, in 1939. And I grew up out on a farm.

And moved to Wausau and took a

secretarial job where I met my husband and stayed there after I was married for several years.

Then we moved to Marshfield when our son was born.

We were called in to service. He was in the National Guards. And we went -- were called to Washington. We stayed there almost a year.

Moved back to Stratford, Wisconsin, because there wasn't any available housing in Marshfield because the whole units were moving back home. We lived there for seven years.

My husband, all this time, worked at Weyerhaeuser, from the time I met him until he de- -- passed away.

After seven years, we did buy a home in Marshfield, which is at our present residence. And we've been there for, it will be, 46 years. It will be in July.

Q. Okay. Your present residence, again, is what address?

A. 402 North Peach Avenue, Marshfield.

Q. All right. So about when did your husband, Urban, begin working at the Marshfield Weyerhaeuser door -- door plant?

A. Because I did not know him when he started

1 there and no one seems to have exact records, it was
2 between '53 and '54 is the best that I could come up
3 with. And he was 18.

4 Q. Okay. I think there may be some records on
5 that now. So we'll have -- whatever is actually in
6 the records is what would be correct?

7 A. Because I did not know him so --

8 Q. Right.

9 A. -- at that point.

10 Q. Okay.

11 A. But I know it was -- he was there 46
12 years.

13 Q. And about when did you say you met him?

14 A. I met him in '58. Late '57, '58.

15 Q. Okay. And when did you all get married?

16 A. July 25th, 1959.

17 Q. Okay. And about when did you move to
18 Stratford?

19 A. That was approximately a year and a half --
20 almost two years after we got out -- after service.
21 Because we got called in. So Stratford -- we
22 returned from service in '62. And we moved to
23 Stratford in '62 --

24 Q. Okay.

25 A. -- after he was discharged.

1 Q. All right. So what branch of the service
2 was he in?

3 A. He was in the National Guards, Army.

4 Q. When you moved to -- to 402 North Peach,
5 what, if anything, did you observe about there being
6 dust in the air?

7 A. Well, first, when we moved, of course, you
8 don't pay that much attention.

9 But it was right away. I noticed it
10 when I'd -- Urban would come home, and the dust would
11 be on his clothes, his shoes.

12 If I'd hang sheets out or laundry, I'd
13 have to usually pull them back. I stopped doing that
14 because I had to rewash them. It would be covered
15 with this film dust particles.

16 And it would be outside on our windows,
17 on the sills. If I opened the windows, it would, of
18 course, filter in the house so...

19 Q. Can you tell us the color of -- of what dust
20 you saw?

21 A. I would say it would be off-white, very
22 light in color.

23 Q. Okay. Was there -- was there any other
24 colors to the dust?

25 A. At times, along -- it would filter -- it

1 would be the black, which was totally -- it was not
2 the dust part. The dust itself was light.

3 Q. That's the part that created the film, the
4 white -- white-ish --

5 A. Yes.

6 Q. -- part?

7 A. Yes, it did.

8 Q. Is it -- was it white, or was it more of an
9 off-white?

10 A. I'd say off-white, off -- light.

11 Q. How often did you do the laundry?

12 A. Well, two --

13 Q. And I'm talking about at -- at Peach
14 Street --

15 A. Yes.

16 Q. -- and later.

17 A. Two to three times a week. They would be in
18 a hamper in between.

19 Q. And where would this dust be? Where would
20 it appear on -- in the process of doing the laundry,
21 I mean, was it -- was it -- was it on the clothes
22 when they came out of the -- the --

23 Did you have a washing machine?

24 A. Yes.

25 Q. Okay. Was it on the clothes when they came

1 out of the washing machine or --

2 A. It --

3 Q. -- or at what point did it actually appear
4 on the cloth- -- on the -- on the laundry?

5 A. Only when he came home from work. I mean,
6 I'd fold it up. And then the water and the soap
7 always took care of it, to my knowledge.

8 Q. Okay. So -- so the water and the soap
9 cleaned what he brought home on his clothing from
10 work?

11 A. Yes.

12 Q. Okay.

13 A. To my knowledge, yes.

14 Q. All right. Did you see the dust at all
15 after that, like, when it was outside, hanging --
16 hanging the clothes?

17 A. Well, yes. That's why I stopped hanging
18 clothes outside --

19 Q. Okay.

20 A. -- because it -- it would filter in on
21 everything.

22 Q. The dust then got cleaned by the washing
23 machine. Then you put the laundry outside -- -side,
24 and then --

25 A. It would gather on that. So that's --

1 right. You could see it -- physically bring it in,
2 and it had the -- a little bit of the residue on it
3 from the air.

4 Q. Was -- was what you saw when you hung the
5 laundry out in terms of color -- how did that compare
6 to what he brought home?

7 A. The same. They looked the same.

8 Q. And in -- and in -- in terms of distance,
9 based on what you know -- and I know you're not out
10 there with a measuring tape or anything. But about
11 how far would you describe your place at -- on Peach
12 Street from the door plant --

13 A. About --

14 Q. -- in Marshfield?

15 A. Approximately three -- between three and
16 four blocks. Very close.

17 Q. Was the -- the dust on the outs- --
18 coming -- on the outside parts, the windows and the
19 laundry that was hung out -- was that something that
20 was there every single day or --

21 A. Pretty much, from what I recall, it was just
22 there all the time. It just was.

23 Q. Was there any difference in terms of how
24 much dust based on wind or anything like that?

25 A. Well, if there was wind, of course, it

1 seemed heavier, it appeared.

2 Q. Wind coming from the plant?

3 A. Yes. If it came in that direction, we
4 usually got a little more.

5 Q. Was there any other places where you
6 observed the dust, like on any -- on the vehicles or
7 any places like that?

8 A. If our vehicle was parked out, yes, it would
9 be fine on the windshield. You could just see it.
10 It was a film. Very -- definitely noticeable.

11 Q. What color was that film on the car
12 windshield?

13 A. The same. Same color, that light,
14 off-white.

15 Q. What -- what other places, if any, did you
16 observe outside the house?

17 A. Window sills, windows. If, you know -- if
18 windy -- going -- between the screens -- inside,
19 between the screens and the windows, it would settle
20 in there.

21 Q. All right. I'd like to --

22 And let me just ask, what -- was there
23 any complaints that you -- you all made to anybody
24 connected with Weyerhaeuser or -- I know he worked
25 there so -- but --

1 A. Not that I'm aware of. If there were
2 complaints, we were not one of them. We just thought
3 that was part of the environment. We really did back
4 then. You didn't -- we knew it was from
5 Weyerhaeuser. But again, I can't answer one way or
6 the other. If any personal complaints were made, I
7 do not know.

8 Q. Is that kind of dust still out there
9 today?

10 A. No.

11 Q. Okay.

12 A. No.

13 Q. So somewhere along the line there, it
14 stopped?

15 A. It was corrected, yes.

16 Q. Okay.

17 A. Yes.

18 Q. Would you -- would your best estimate be
19 that it was there for at least ten years after you
20 moved there or -- or more?

21 A. In 1980 is when things were corrected. So,
22 yes, we were -- we were there from -- yeah. It was
23 at least ten we were there.

24 Q. What do you remember in 1980 that makes you
25 say things were corrected?

1 A. It -- the air became cleaner. It was
2 definitely a difference.

3 And it was in the local papers that
4 they were working on these things. So it was kind of
5 public knowledge.

6 But it -- a lot of the smoke stacks
7 were fixed and also the -- the dust. It just
8 disappeared after a while.

9 Q. Uh-huh. What did you see in the local
10 papers? Just your -- your recollection.

11 A. Well, that they -- it was an issue with
12 Weyerhaeuser, complaints of the atmosphere, that it
13 was polluting. And I did not know it was asbestos.
14 I didn't know that, but it was out there. So --

15 Q. Okay.

16 A. -- it was definitely in the media back
17 then.

18 Q. When you did the laundry at home, did you
19 shake out the clothes or anything like that to get
20 the dust off, or how did you -- how did you handle --
21 handle the laundry in terms of getting it into the
22 washing machine? I'm talking about Urban's
23 clothes --

24 A. Yes.

25 Q. -- for work.

1 A. I usually would take them out -- or --
 2 out -- shake it out and then put it in the -- on the
 3 washer.
 4 Q. And where was the area where you did the
 5 washing inside the house?
 6 A. Actually, at that point -- at that point,
 7 we -- it was in the basement.
 8 Q. Okay.
 9 A. It has since been brought upstairs, but it
 10 was downstairs.
 11 Q. So before 1980, it was in the basement?
 12 A. Yes. Yes, it was.
 13 Q. When he came home and he -- and he took his
 14 clothes -- changed his clothes, where did they get
 15 stored? Like, in a hamper or what area?
 16 A. A hamper.
 17 Q. Okay. And where was the hamper?
 18 A. In our hallway.
 19 Q. This was upstairs?
 20 A. This was on the -- right. Ground floor. It
 21 was next to our bedroom actually in the bathroom. It
 22 was in a hall.
 23 Q. So -- so the house on Peach Street that you
 24 live in has a -- has a basement and a fir- -- and
 25 basement and first floor, and that's the two floor --

1 A. And an upstairs also.
 2 Q. You've got an upstairs?
 3 A. Yes, we do.
 4 Q. So the hallway is -- is on the first
 5 floor --
 6 A. Right.
 7 Q. -- where the laun- -- where the hamper --
 8 A. Right.
 9 Q. Okay. You've got to wait until I finish my
 10 question. She can't take us both down at the same
 11 time.
 12 What's your best recollection as to how
 13 many times you would be doing the laundry when you
 14 first got to Peach Street in 1969?
 15 A. Two to three times a week.
 16 Q. All right. I want to just use this as -- as
 17 **Exhibit No. 4**. We can go ahead and have her mark
 18 that.
 19 (Deposition **Exhibit No. 4** marked for
 20 identification.)
 21 BY MR. MCCOY:
 22 Q. Okay. So **Exhibit 4** you've seen. This is
 23 titled "Plaintiff's Response to Weyerhaeuser
 24 Interrogatories." And the caption has -- has your
 25 name as the party bringing the case. You've seen

1 this before; right?
 2 A. Yes, I have.
 3 Q. Okay. And you reviewed these. You provided
 4 information for which these were prepared by my law
 5 firm before. And then you actually reviewed the
 6 final version and provided your signature on this
 7 yesterday; right?
 8 A. Correct.
 9 Q. Okay. Late -- late at night; right?
 10 A. Yes, it was.
 11 Q. Okay. Okay. So the -- you had a couple
 12 corrections that I think you made here just for the
 13 record.
 14 So on page 2 --
 15 Do you have a copy in front of you
 16 there?
 17 A. Okay.
 18 Q. Where it says "Urban born and raised in
 19 Dorchester, Wisconsin" --
 20 A. Right.
 21 Q. -- you -- you corrected that --
 22 A. Yes, I did.
 23 Q. -- to -- to say Athens; right?
 24 A. Athens, Wisconsin.
 25 Q. Okay.

1 A. A-T-H-E-N-S.
 2 Q. Right. And then down below that, still on
 3 page 2, where it's got your name, it's -- it's
 4 spelled -- your middle name is spelled in the typed
 5 version by my law firm A-N-N-E. And you corrected
 6 that mistake my law firm made and took out the E;
 7 right?
 8 A. Correct.
 9 Q. Okay.
 10 A. Yes.
 11 Q. And that was the only corrections that you
 12 needed to make; right?
 13 A. Yes.
 14 Q. Okay. And then you signed; right?
 15 A. Yes, I did.
 16 Q. Okay. Now, let's go to a slightly different
 17 area. You can put that -- put that aside.
 18 I want to change subjects and talk
 19 about your husband for a moment --
 20 A. Sure.
 21 Q. -- and your recollection.
 22 A. Okay.
 23 Q. Now, he -- he was -- do you remember when he
 24 was diagnosed with mesothelioma approximately?
 25 A. 2013.

1 Q. Okay. And then he passed away a couple
2 months later; right?

3 A. Correct. Yes, he did.

4 Q. Yeah. What I want to ask you is, when --
5 when did you first notice changes in his health that
6 were significant in terms of time period before he
7 actually passed away?

8 A. Two to three years before he passed away.

9 Q. And what things -- what things did you
10 observe in terms of his -- his physical or emotional
11 well-being that were changing?

12 A. He became more lethargic, tired.
13 He'd get up in the morning. He'd eat a
14 little bit. And he just seemed to rest more, sleep.
15 Disinterested in things that we used to
16 do, such as just even going out for dinner.
17 Anything. It just was too much for him.
18 We had a place up in Phillips. We got
19 up there less and less. It was just too -- too
20 tiring for him.
21 He just slept more and more.
22 More disinterested in our daily living.
23 Didn't want to travel. Didn't want to do much. It
24 just was too hard. He was too tired. Just not up to
25 it.

1 Appetite decreased tremendously at that
2 point. Didn't know why, but he just couldn't eat.
3 And he was -- ate very hardy otherwise. And it just
4 got worse and worse until he passed away.
5 He loved fishing, loved it. And that
6 was his major thing that he loved to do. And that
7 also became harder. Did it less. It was -- and that
8 was a big change that we noticed because that was his
9 absolute favorite thing to do for a pastime.
10 Q. You've brought with you a couple pictures
11 today.
12 A. Yes, I did.
13 Q. Okay. We had marked as Exhibits 1 and 2 the
14 black-and-white copies of these. So what -- what I
15 wanted to ask you was, just briefly tell us what --
16 when each of those photos was taken. Start with --
17 start with the first one, earliest one.
18 A. Well, this was for our 50th wedding
19 anniversary. This was the -- and that would be six
20 years and a few weeks. One of them. I -- there's
21 more of it. These are all I brought.
22 This was June of '13 at our
23 granddaughter's graduation. He's on the end. He
24 al- -- was already not feeling well.
25 And this was our granddaughter's

1 wedding in July of '13. And that day he -- he made
2 it there, but that was -- it was a bad day for him.
3 Q. Bad day in what way?
4 A. In -- in -- he sat most of the day. Ate
5 very, very little. Just -- you could tell he was
6 very -- not feeling well. He just had a hard time.
7 It was a very difficult weekend for him. Went back
8 to the hotel early. He just could not function very
9 well, physically or emotionally.
10 Q. Had his diagnosis occurred yet at that time
11 of the mesothelioma?
12 A. No, it had not.
13 Q. I mean, actually -- actually, just to be
14 correct, before he passed away, the diagnosis was
15 just cancer, but an unknown type; right?
16 A. Correct.
17 Q. Okay.
18 A. Right.
19 Q. And then later, there was -- there was an
20 autopsy which --
21 A. Correct, right.
22 Q. Okay.
23 A. And that's when that was diagnosed then.
24 They found it.
25 Q. Right. The actual type of cancer; right?

1 A. Right.
2 Q. Okay. But you -- you certainly knew
3 before -- a couple months before that he had --
4 before he passed away that he had cancer?
5 A. Yes. And that -- it was related. That's
6 why they were checking at the clinic, the hospital,
7 trying to find out where the primary site was. And
8 they never could match it. They didn't know what it
9 was.
10 Q. And that was all figured out on autopsy?
11 A. Correct, right.
12 MR. MCCOY: All right. Then I believe
13 that covers all the questions I have for you,
14 Ms. Pecher. So we'll let --
15 THE WITNESS: Okay.
16 MR. MCCOY: -- the other attorneys --
17 THE WITNESS: Thank you.
18 MR. MCCOY: -- go ahead.
19 EXAMINATION BY MR. MCGUFFEY:
20 Q. Ms. Pecher, again, my name is Mitch
21 McGuffey. I represent Weyerhaeuser Company.
22 A. Okay.
23 Q. So I'm going to be the next person asking
24 you questions.
25 A. Okay.

1 Q. I know we went through some of this, but
 2 we're going to go back over some background questions
 3 and things like that, if that's okay.
 4 A. (Witness nods her head.)
 5 Q. So could you tell me a little bit about
 6 Mr. Pecher's parents?
 7 A. They were -- he was raised on a farm. They
 8 were farmers. His mother did work at a basket
 9 factory. His dad was on the farm. His mother lived
 10 to be 95, and his dad lived to be 84. And they were
 11 both healthy. I mean, you know --
 12 Q. Do you know if either of them had any
 13 history of cancer?
 14 A. His mother had breast cancer about -- when
 15 she was about 60, which was a success. She had it
 16 removed.
 17 Q. And did he have siblings?
 18 A. Yes. There were four others.
 19 Q. Can you tell me just a little bit about them
 20 and how old they are, if they're still alive or --
 21 A. They're all --
 22 Q. -- when they passed.
 23 A. They're all living.
 24 His oldest sister would be Rose. And
 25 she has Alzheimer's. She's maybe 83, 84. I'm not

1 exactly sure. She lives in Edgar, Wisconsin.
 2 And Clemens --
 3 Q. Is Rose the oldest?
 4 A. Rose is the oldest.
 5 Q. Where does Urban fall in the line?
 6 A. He's the middle.
 7 Q. Okay. He's in the --
 8 A. He's -- he'll be --
 9 Q. He's in the middle of the five?
 10 A. Yes, he is.
 11 Q. Okay.
 12 A. Clem is 80 -- he'll be 81. And he lives in
 13 Marshfield. And he also worked at Marshfield Doors,
 14 Weyerhaeuser/Roddiss.
 15 Q. Do you -- do you know what he did at the
 16 plant?
 17 A. He worked in the paint shop. I -- that
 18 would -- I know he worked there at one point. The
 19 rest I -- I can't answer. I don't know.
 20 Q. Did he and -- did he and Urban work
 21 together, or were they in separate parts of the
 22 plant?
 23 A. They were separate.
 24 Q. Where does he live in Marshfield?
 25 A. He lives on Palmetto, which is close to --

1 Q. Uh-huh.
 2 A. -- Weyerhaeuser.
 3 Q. How far is that from where you live?
 4 A. A block and a half, two blocks.
 5 Q. Do you know if he has had any respiratory
 6 problems or anything like that?
 7 A. Not to my knowledge.
 8 Q. Okay. And who's -- is Urban -- Urban is
 9 next. We'll skip over him. We're going to come back
 10 to him.
 11 A. Okay.
 12 Q. Who's -- who comes next?
 13 A. Okay. His brother Duane, D-U-A-N-E. He did
 14 not work there. He worked different jobs. He's
 15 healthy, very fine. He's 75. He lives in
 16 Stetsonville, Wisconsin.
 17 Q. And he never -- you don't think he ever
 18 worked at the plant?
 19 A. No. I know he did not.
 20 Q. Okay.
 21 A. No.
 22 Q. And then he has another sister; is that
 23 right?
 24 A. Patricia, Pat. She lives in Dorchester.
 25 She is 72. She will be. She's 71 right now. She

1 worked in Medford. She's healthy. She had breast
 2 cancer 30, 35 years ago, which is also successful.
 3 Q. Does anyone else in the family -- does -- do
 4 any of the other siblings have any history of cancer,
 5 skin cancer, breast cancer --
 6 A. No.
 7 Q. -- anything like that?
 8 A. No.
 9 Q. And you have children --
 10 A. Yep.
 11 Q. -- that's right?
 12 A. Yes.
 13 Q. Can you tell me ages, kind of when they were
 14 born, where they live now, that sort of thing?
 15 A. Mark is 54. He lives in Pleasant Prairie.
 16 Officer in a bank. Like I said, he's healthy. He's
 17 fine. He's married. Have children.
 18 Q. Has he had any -- any history of cancer or
 19 anything --
 20 A. No, no.
 21 Q. Any respiratory problems?
 22 A. No.
 23 Q. Okay. Who's next?
 24 A. Carrie, C-A-R-R-I-E. She lives in Chicago
 25 and -- on Huron Street. Huron Street.

1 Q. Uh-huh.
 2 A. And she works in Walgreens in corporate.
 3 And she also is healthy.
 4 Q. How old is she?
 5 A. 53.
 6 Q. Any history of cancer or --
 7 A. No.
 8 Q. -- respiratory problems or anything of that
 9 nature?
 10 A. No, none.
 11 And then Shelli, S-H-E-L-L-I.
 12 Q. Okay.
 13 A. She lives in Marshfield. She works at our
 14 local clinic. She's also healthy.
 15 Q. And how old is she? You may have said
 16 but --
 17 A. No. She's going to -- she's 47. I can't --
 18 Q. 47.
 19 A. Yeah.
 20 Q. Okay.
 21 A. She will be. She's 47 now.
 22 Q. And did -- did all the children grow up on
 23 Peach Avenue?
 24 A. Well, no. In Stratford. When we moved,
 25 Mark was seven. Carrie was six and -- or eight,

1 seven, and two. Because the last two are five years
 2 apart. They were --
 3 Q. And --
 4 A. We lived over there during those five --
 5 Q. Okay.
 6 A. -- seven years.
 7 Q. So they were all born while you were in
 8 Stratford; is that right?
 9 A. No. One was born in Wausau --
 10 Q. Okay.
 11 A. -- Wisconsin.
 12 Our daughter, Carrie, was born in
 13 Olympia, Washington, because we were in service.
 14 Q. When you were in service. Okay.
 15 A. And then Shelli was born in Marshfield.
 16 Well, no. She was born in Stratford, but I mean,
 17 locally, she was born.
 18 Q. Right.
 19 A. Yes.
 20 Q. Where does Shelli live in Marshfield?
 21 A. 400 East 20th in Marshfield.
 22 Q. Has she -- has she had any other addresses
 23 in between living with you and Peach Avenue --
 24 A. No.
 25 Q. And that --

1 A. She's lived there since they were married.
 2 MR. MCCOY: You have to wait until he
 3 finishes his question --
 4 THE WITNESS: Oh, I'm sorry.
 5 MR. MCCOY: -- or you're going to be in
 6 trouble.
 7 THE WITNESS: Okay. I don't want to be
 8 in trouble.
 9 MR. MCGUFFEY: She'll get -- she'll get
 10 a -- she'll get a --
 11 THE WITNESS: I don't want to be in
 12 trouble.
 13 MR. MCCOY: Right.
 14 THE WITNESS: Sorry.
 15 BY MR. MCGUFFEY:
 16 Q. She works -- what does she do at the
 17 Marshfield Clinic?
 18 A. She works in the office part. She just
 19 started a new job there. They -- so she works with
 20 billing and things like that. She's been there 20
 21 some years.
 22 Q. Okay. I'm going to walk through --
 23 actually, he's already marked your interrogatory
 24 responses. I believe it's Exhibit 4.
 25 MR. MCCOY: Yes.

1 BY MR. MCGUFFEY:
 2 Q. Would you grab that for me? And go back to
 3 page 2 where he had you.
 4 All right. So on the past addresses, I
 5 would like to walk back through them because I have
 6 at least -- I have a question about at least one of
 7 them.
 8 So Mr. Pecher was born and raised in
 9 Athens --
 10 A. Yes.
 11 Q. -- that's right?
 12 A. Yes.
 13 Q. Did he ever live in Dorchester?
 14 A. No, no.
 15 Q. And then he moved to Wausau when you all met
 16 or before you all met?
 17 A. Well, after we got married, he moved there.
 18 He lived with his parents until then.
 19 Q. Okay. How far is Athens from the Marshfield
 20 plant? Just give me a guess.
 21 A. 20 -- maybe 20 miles.
 22 Q. And Wausau?
 23 A. 12.
 24 Q. Okay. And the next thing that's listed on
 25 here is -- is a house on the 200 block of South

1 Maple. Is that listed on your copy as well? In
 2 1961.
 3 A. Yeah. We were there about five months. And
 4 then he was called in service.
 5 Q. That's -- that's South Maple Street in -- in
 6 Marshfield?
 7 A. Right.
 8 Q. Okay.
 9 A. Right.
 10 Q. How close is that to the plant?
 11 A. Five, six blocks.
 12 Q. Is it near here?
 13 A. Here? Yes. It's, like, right across the
 14 street down the block.
 15 Q. Okay.
 16 A. Yes, it is.
 17 Q. Do you know the cross street just so -- we
 18 have -- we just have an approximate because I assume
 19 we don't know the exact address; is that right?
 20 A. I can't remember.
 21 Q. Yeah.
 22 A. It's -- it's on Maple it was.
 23 Q. Do you know what street -- was it near an
 24 intersection?
 25 A. It's by the railroad on one end. So

1 that's -- it was a dead end there. By the
 2 railroad.
 3 Q. And then you moved to Stratford. Do you
 4 know where you lived in Stratford?
 5 A. I know where, but I can't remember the
 6 address. It was off of Main Street. And there's
 7 only -- it's a small community.
 8 Q. Is that close to Highway 97?
 9 A. A block off.
 10 Q. And then you moved to 402 North Peach?
 11 A. Correct.
 12 Q. Okay.
 13 A. Seven years later.
 14 Q. Right. Can you -- under Subsection E here,
 15 can you tell me if all the information about you is
 16 correct? I just want to confirm the Social Security
 17 number, in particular.
 18 A. Where is that?
 19 Q. It's on page 2, part E. It's got your
 20 personal information.
 21 A. My Social Security?
 22 Q. Yes.
 23 A. Yes, that's correct.
 24 Q. Great.
 25 A. Yes, that's correct.

1 Q. Do you -- can you tell me who -- I'm sure
 2 you can because that's -- I've seen your maiden name.
 3 Can you tell me who Alfred Sulzer is?
 4 A. He's my dad.
 5 Q. Okay. Was he the -- did he receive you
 6 all's mail while you lived in Washington? Does that
 7 sound familiar?
 8 A. Excuse me? Repeat that.
 9 Q. Did he ever -- did he -- was he your
 10 forwarding address while you lived in Washington?
 11 A. I can't answer that. I don't recall if we
 12 got mail there. We must have because we were there a
 13 while. We did have a mailbox.
 14 Q. And can you tell me just a little bit about
 15 Olympia and where you lived and were you on base?
 16 A. We were off base. We were by the Olympia
 17 pier, the water, in a -- in an apartment complex with
 18 other people in service. We had our daughter out
 19 there, like I told you. And we already had our son.
 20 We were there -- I went out to meet him in October --
 21 November. And we came back the following July -- end
 22 of July or first part of August because our daughter
 23 was just born. She was a new baby.
 24 Q. Do you -- can you -- do you know what he did
 25 in the service?

1 A. Well, he was on base. I know he dro- --
 2 drove their trucks. And I don't know what they're
 3 called. Big ones.
 4 Q. Big trucks?
 5 A. Big trucks. I don't know what they did.
 6 Well, they were called in. It was a
 7 Bay of Pigs Invasion.
 8 Q. Got it.
 9 A. And --
 10 Q. Did he ever go -- he never went --
 11 A. Overseas or anywhere?
 12 Q. Overseas?
 13 A. No, no. We never left base -- or area.
 14 Q. Do you know if he was ever -- if he ever
 15 left the -- his parents' house or you all's home for
 16 any other military purpose, basic training, anything
 17 like that?
 18 A. The basic training he had before I met
 19 him.
 20 Q. Okay.
 21 A. But when he was in service, I met him.
 22 And every two weeks, he'd have to go
 23 away for a summer to camp and different areas where
 24 they had -- like, one was Fort -- he was stationed at
 25 Fort Lewis is -- was a -- but once a year --

Page 37

1 Q. Is Fort Lewis in Wisconsin?

2 A. Washington.

3 Q. Washington.

4 A. Fort Lewis. That's where his -- the --

5 Q. Yep.

6 A. That's where the base was.

7 And two weeks out of every year, he had

8 to go to training. They'd go different areas.

9 Sometimes it would -- mostly out of state. They

10 would go for two weeks' training.

11 Q. And he did basic before you all met?

12 A. Yes. And after. He stayed in. After we

13 left Washington, he was in for six years. And then

14 he quit.

15 Q. Okay. The next thing -- I'm going to --

16 just pardon me for just one minute. I didn't bring

17 something to the table.

18 The -- the -- Mr. -- you mentioned

19 earlier that there aren't records about Mr. Pecher,

20 but I'm about to let you see the records for

21 Mr. Pecher.

22 A. Okay.

23 Q. I thought they had already been produced,

24 but we are going to go ahead and mark them here.

25 (Deposition Exhibit No. 5 marked for

Page 38

1 identification.)

2 MR. MCGUFFEY: You can hand her that

3 copy.

4 BY MR. MCGUFFEY:

5 Q. All right. If you could take a look at

6 that --

7 MR. MCCOY: So -- so before we begin --

8 MR. MCGUFFEY: Yes.

9 MR. MCCOY: -- the questioning on those

10 records, I -- I just want to establish, Ms. Pecher,

11 you -- you have not seen Urban's employment records

12 from the files of Weyerhaeuser or Roddis before; is

13 that correct?

14 THE WITNESS: No, I have not.

15 MR. MCCOY: This will be the first

16 time --

17 THE WITNESS: Right.

18 MR. MCCOY: -- that you're looking at

19 these?

20 THE WITNESS: Correct.

21 MR. MCCOY: Okay. Go ahead.

22 BY MR. MCGUFFEY:

23 Q. So you can take your time and thumb through

24 that. And then I'll ask some -- I'll ask some

25 questions afterwards.

Page 39

1 MR. MCCOY: You -- if you want, you can

2 just go ahead with your questions.

3 MR. MCGUFFEY: We'll do that.

4 MR. MCCOY: I think it's probably

5 easier. She -- she hasn't seen these.

6 MR. MCGUFFEY: No problem.

7 MR. MCCOY: If you need to look at

8 anything that he's not asking you about, just feel

9 free to, but go ahead and answer --

10 THE WITNESS: Okay.

11 MR. MCCOY: -- what he's asking you to

12 the best --

13 THE WITNESS: I will.

14 MR. MCCOY: -- of your knowledge.

15 BY MR. MCGUFFEY:

16 Q. As we go -- as you flip through, if you look

17 kind of under where the jobs are listed, it will say

18 first, second, third, fourth, and it gives addresses.

19 A. Okay.

20 Q. Did you --

21 A. On the front page?

22 Q. Yes.

23 A. Yes.

24 Q. So Route 2, Athens, is that his parents'

25 home?

Page 40

1 A. I'm assuming that, yes. Yes, it must have

2 been.

3 Q. And we don't know about Dorchester; is that

4 right?

5 A. No.

6 Q. Okay.

7 A. I can't answer that.

8 Q. This Maple Street --

9 A. That has to be -- it's 205 and a half,

10 that's correct, because I remember it now.

11 Q. Is this also correct, that that was you

12 all's address in Wausau?

13 A. That's where we lived for two years after we

14 got married.

15 Q. Okay.

16 A. Yes.

17 Q. Now, the -- if you flip to the next page,

18 the second address listed is on East 8th Street in

19 Marshfield. Does that refresh -- refresh your

20 recollection as to where you lived for those few

21 months before service?

22 A. No, but I --

23 Q. Does that ring --

24 A. I thought it was Maple.

25 Q. -- any bells?

1 A. Well, I know -- if -- that has to be
 2 correct. But I -- it was -- if that's by Maple
 3 Street, that would be correct.
 4 Q. And this is where I saw your dad's name,
 5 just so you know.
 6 A. Yes, yes.
 7 Q. The post office box number in Stratford, was
 8 that your -- your mailing address there?
 9 A. Yes. That was correct.
 10 Q. And then the next page gives us North Peach.
 11 And that's our last address.
 12 A. Correct.
 13 Q. The next thing that I'm going to do is kind
 14 of walk through this. And you may or may not know
 15 details about any of these places, but I'm going to
 16 walk through the job that he did --
 17 A. Yes.
 18 Q. -- at the plant.
 19 A. Sure.
 20 Q. And you just let me know what you -- what he
 21 ever told you or what he talked about --
 22 A. Sure.
 23 Q. -- with you about those things.
 24 The first question is, what shift did
 25 he work?

1 A. He worked days.
 2 Q. Did he work days from the moment you got
 3 married until he -- until he --
 4 A. Yes.
 5 Q. -- finished?
 6 A. Yes.
 7 Q. And did he ever talk to you about operating
 8 the trim saw or rip saw?
 9 A. Rip saw sounds familiar.
 10 Q. Okay.
 11 A. It does.
 12 Q. Do you know if he ever complained about it
 13 being a dusty job or anything like that?
 14 A. I -- there was sawdust -- or dust, sure.
 15 Q. Did he like it?
 16 A. He always said he did.
 17 Q. And he worked there -- he worked --
 18 according to the records at least, he worked as a --
 19 as a rip saw operator until '64. So that would have
 20 been when you were -- when you were living in Wausau
 21 and Stratford, is that right, roughly?
 22 A. Probab- -- yes. I -- I'm -- I'm -- I assume
 23 that -- was that right?
 24 Q. Yeah. I'm just trying to make sure I have
 25 everything clear. That's -- that's -- yeah.

1 MR. MCCOY: Just answer what -- what
 2 you know.
 3 MR. MCGUFFEY: Sure.
 4 MR. MCCOY: If you don't know, you
 5 don't know, and that's your answer.
 6 BY MR. MCGUFFEY:
 7 Q. Was he a member of a union?
 8 A. Yes, he was.
 9 Q. What's the name of the union?
 10 A. I think it was 1733 Carpenters & Joiners, if
 11 I recall that right. I think that's correct.
 12 Q. And did he commute every day from Wausau and
 13 Stratford?
 14 A. Yes, he did.
 15 Q. Do you remember there being dust on the car
 16 or on his clothes at -- in those times?
 17 A. I'm not -- I don't know.
 18 Q. Do you know where in the plant he worked
 19 during that period?
 20 A. No, I do not know.
 21 Q. Did you ever visit him at the plant?
 22 A. No. When he retired, yes. Our whole family
 23 was there and toured it all. I have to say I was
 24 never in there, no.
 25 Q. He retired in 2000 or thereabout?

1 A. Yes, yes.
 2 Q. And they -- they took you on a guided
 3 tour?
 4 A. Yes. And had a big party for him.
 5 Q. Do you know what materials he worked with
 6 while he was there?
 7 A. He -- his last jobs were with the doors. He
 8 cut out the lights in the door, the -- where they
 9 would put glass. I think it was called hollow core.
 10 That sounds familiar to me. For quite -- for quite a
 11 while. Years worth.
 12 Q. We'll get there. I'll show -- you're
 13 absolutely right.
 14 Did he ever mention or talk to you
 15 about being a tenon- -- tenoner operator? Do you
 16 know what that is?
 17 A. I'm sorry. I don't know what that is.
 18 Q. I had to look it up myself.
 19 Did he ever talk to you about feeding
 20 doors, like, during the glue process or anything like
 21 that?
 22 A. He was on a machine where they did do some
 23 trimming, sawing. That -- that sounds familiar.
 24 Q. Did he talk to you about being a --
 25 Well, actually, do you remember him

1 very briefly moving to a dryer offbearer where they
 2 were doing glue drying?
 3 A. I -- I do not know. I can't answer that.
 4 Q. And did he talk to you about being a lift
 5 truck operator?
 6 A. I recall some of that. Yes, I do. I'm not
 7 sure how long.
 8 Q. If you're -- if you're interested, you can
 9 look at page 3.
 10 A. 3?
 11 Q. That's -- he -- apparently for about a year
 12 and a half.
 13 A. Okay.
 14 Q. Starting in 1971.
 15 A. Thank you.
 16 Q. Do you know where in the plant he was --
 17 he -- he did that?
 18 A. No, I don't know.
 19 Q. Now, in 1973, we have listed that he was a
 20 refuse hauler. I assume that means he was a waste
 21 truck driver.
 22 A. Yes.
 23 Q. Did he talk to you about that?
 24 A. Yes.
 25 Q. What did he tell you about that?

1 A. He would do that on weekends to pick up
 2 extra time.
 3 Q. How long -- how often did he do it? How
 4 long did he do it?
 5 A. Most weekends. Probably a few years. I --
 6 I -- I can't answer that exact.
 7 Q. To -- to the best of your recollection, did
 8 he ever do that -- was he a full-time truck driver
 9 for them?
 10 A. No, no.
 11 Q. Do you know what type of waste he hauled in
 12 the trucks?
 13 A. I believe it was asbestos. There -- what --
 14 when they had these big refuse containers, it was in
 15 those, and he had to remove it. I don't know the
 16 procedure, but then he would haul it to their
 17 designated dump sites.
 18 Q. And do you know where the dump site was in
 19 1973?
 20 A. I think one was -- I shouldn't say "think."
 21 I believe it was at the airport area. It's near
 22 Marshfield.
 23 And I just found out years later they
 24 had one in Stratford area. I -- I don't know the --
 25 where they are exactly.

1 Q. Do you know if he hauled other types of
 2 waste, or can you just -- you don't know one way or
 3 the other?
 4 A. I think that was -- to my knowledge, that's
 5 all it was.
 6 Q. Okay. Did he ever talk to you about
 7 inspecting doors?
 8 A. Yes.
 9 Q. What did he tell you about that?
 10 A. He inspected doors.
 11 Q. Was it a dusty job? Was it -- do you know
 12 where in the plant it was, anything like that?
 13 A. I don't know. I don't know.
 14 Q. Now, at that point, in 1975, he moved to
 15 being a -- what they call a detail bench hand?
 16 A. Yes.
 17 Q. And then later, he worked detail router,
 18 which is the little thing that they cut out trim --
 19 A. Windows.
 20 Q. -- and windows.
 21 A. Yeah.
 22 Q. Did he talk to you about that?
 23 A. Yes. I -- it was -- he mentioned it off and
 24 on. I --
 25 Q. Do you know why he wanted to move from being

1 a door insp- -- he had been a door inspector and a
 2 truck driver and all of these things, and then he
 3 went into the detail shop. Did he say why he wanted
 4 to do that?
 5 A. Well, the truck driving was extra, for extra
 6 money.
 7 Q. Okay.
 8 A. The other ones -- and I can't give you an
 9 exact date, but they would be eliminated. They would
 10 have job eliminations. And then they had a bid for
 11 another job.
 12 Q. Uh-huh.
 13 A. And, of course, he always wanted to keep
 14 moving up so, you know -- a better pay.
 15 Q. Did he ever -- did -- did he talk to you
 16 just about the process of -- of what he was doing
 17 either as a -- in the detail shop either as a bench
 18 hand or as a router operator?
 19 A. I know he would have mentioned at times they
 20 didn't have the best -- like, they had fans. They
 21 didn't have any air conditioning. The fans would be
 22 on, especially in the summer and that. There would
 23 be stuff flying, you know, in the air. Other than
 24 that, no, I can't -- anything specific. He seemed --
 25 he seemed to enjoy his job.

1 Q. Do you know where in the plant that was?
 2 A. You mean detail?
 3 Q. Yeah.
 4 A. I -- no, I don't know.
 5 Q. Okay.
 6 A. The location, you mean? No. I don't
 7 know --
 8 Q. Right.
 9 A. -- exactly where it was, no.
 10 Q. Let's shift gears and talk just a little bit
 11 about Mr. Pecher's --
 12 Actually, let me -- let me ask you --
 13 he left in 2000. Did he do any work after he left
 14 Weyerhaeuser?
 15 A. No.
 16 Q. Just retired?
 17 A. Just -- we just retired, yes.
 18 Q. Help grow those flowers?
 19 A. Yeah, yeah. I miss him now doing that, yes,
 20 helping.
 21 Q. Did he do any kind of car repair or anything
 22 like that?
 23 A. Car repair?
 24 Q. Sure. Brake lines, anything like that,
 25 changing anything on your car?

1 A. He -- way back when he did, but as things
 2 progressed, everything was computerized, that
 3 things -- no. He didn't even change the oil any
 4 longer. He had that done.
 5 Q. Did you all do any kind of home
 6 remodeling?
 7 A. Oh, yes.
 8 Q. Tell me about that. Now, I'm -- I'm talking
 9 about even before he retired. And just tell me about
 10 home remodels that you -- you did at North Peach or
 11 at any of your other places.
 12 A. Well, we have -- we had a big addition put
 13 on our home. After our kids left home, we added more
 14 space. We remodeled our whole home because it was an
 15 older home.
 16 Q. Uh-huh.
 17 A. And so it was always a work in progress.
 18 Q. When did you do the addition?
 19 A. 28 years ago.
 20 Q. And you did -- kind of reworked the home
 21 prior to that as well?
 22 A. You know, re- -- redone the walls. Just
 23 made it -- updated it, yes. A room at a time
 24 usually.
 25 Q. And you mentioned that he did car repair way

1 back when.
 2 A. Yes.
 3 Q. Do you know if he ever worked with brakes or
 4 anything like that?
 5 A. No, I don't think so. No.
 6 Q. Do you have an indoor garage, like --
 7 A. Attached, you mean?
 8 Q. Sure.
 9 A. No, it's not. It's detached.
 10 Q. When you park the car in the garage, can you
 11 close it off from the outside?
 12 A. Yes. They --
 13 Q. It has a garage door?
 14 A. Yes.
 15 Q. Right. Mine doesn't. That's why I asked.
 16 A. Yes. It's detached. Yes.
 17 Q. Okay.
 18 A. It does close.
 19 Q. Did you -- is it a one-car or two-car
 20 garage?
 21 A. Two to three. It's a --
 22 Q. Okay.
 23 A. It was built -- we built that too. We did
 24 it so...
 25 Q. Great. When was that added to the house?

1 A. Well, that's not added. It's separate.
 2 Q. Right. I just meant, when was it --
 3 A. Okay. Oh, gosh. 30 plus years ago.
 4 Q. When he came home from -- from the plant,
 5 did he generally park in the garage?
 6 A. He walked.
 7 Q. He walked?
 8 A. He always walked or bicycled until he almost
 9 got run over, so he quit that.
 10 Q. Were the cars generally inside the garage?
 11 A. Our cars? Yes.
 12 Q. All right. So we talked earlier -- you
 13 talked to Mr. McCoy about Mr. Pecher's work clothes.
 14 A. Yes.
 15 Q. Do you know if he had -- do you know if they
 16 had work clothes provided to them at the plant?
 17 A. No. We provided our own.
 18 Q. Did they have lockers at the plant?
 19 A. No. I shou- -- not to my knowledge. I
 20 don't believe they did.
 21 Q. Did he have, like, outer clothes that he
 22 wore to work? Like, did he have, like -- like,
 23 coveralls that he wore to work, or did he just wear
 24 normal clothes?
 25 A. He wore street clothes, but they usually

1 were the uniform type. You know, the shirt and pants
2 to match, the twill. Maybe that's what it was. But
3 it wasn't a uniform.

4 Q. Do you know if they ever -- if they ever
5 washed clothes at the plant or offered showers to the
6 employees?

7 A. Never.

8 Q. So when he came home, his clothes were
9 dusty?

10 A. Yes. And his shoes also. He had shoes --
11 were full.

12 Q. Do you remember that being the case for the
13 entire time that he worked there?

14 A. No. Not -- not after '80s. Early '80s
15 maybe. No. It wasn't, you know, noted then.

16 Q. And you said you do the laundry two to three
17 times a week; is that right?

18 A. Yes.

19 Q. You were talking to him about shaking out
20 the clothes. I just wanted to make sure we were
21 clear. Did you shake the clothes out in the
22 basement?

23 A. No.

24 Q. Or did you do it outside?

25 A. I took them out of the hamper. I would take

1 them outside. It was on the -- you know, the hamper
2 is on the same floor.

3 Q. Right. Okay. Were you aware that -- this
4 is -- we're going to go back kind of to the -- to the
5 office. Were you aware that he was part of something
6 called the asbestos surveillance program, that --
7 that he had regular medical checks through the
8 plant?

9 A. Yes, he did. They had to have chest
10 x-rays.

11 Q. And do you know -- we have the records to --
12 to tell you when it is, but do you recall when he
13 started doing that or --

14 A. No, I don't remember.

15 Q. Did it continue up until the time he left?

16 A. I don't believe so, but I can't answer that
17 exact.

18 Q. Did you ever -- do you -- do you know or
19 have you ever met Daniel -- Dr. Daniel Quinn?

20 A. That does not sound familiar.

21 Q. Dr. E. P. Horvath?

22 A. No.

23 Q. Did Mr. Pecher have any history of
24 smoking?

25 A. No. He may have smoked before I met him,

1 but not since we were married. He did not.

2 Q. You got him to straighten up?

3 A. No. That was his own idea.

4 Q. Just one second.

5 Did he -- during the time that he
6 worked, do you remember him complaining about having
7 problems breathing?

8 A. No, not specifically. No.

9 Q. Did he have any sort of chronic cough?

10 A. Actually, he -- he did. And it was either a
11 nervous cough is what we thought, but he would clear
12 his throat often during a day, but that was -- that's
13 all I recall.

14 Q. Did he wheeze or anything like that? Any --

15 A. No.

16 Q. -- asthma?

17 A. No asthma, no.

18 Q. Do you remember when the -- the
19 throat-clearing sort of started?

20 A. For years. I mean, it really was years.

21 Q. I'm going to move to sort of his medical
22 history, treatment history, and things like that.

23 Do you know the names of his treating
24 physicians just generally? His -- your family
25 doctor, primary doctor, anything like that?

1 A. Our family doctor used to be Dr. Leer,
2 L-E-E-R.

3 When he retired, it's Dr. O-J -- it's
4 O-J-A-Y, Oswani, O-S-W-A-N-I.

5 His cancer doctor was Dr. Ali, A -- I
6 believe it's A-L-I; Bseiso, B-A-E-I-S-O (verbatim).
7 I -- I think that's correct. I'm not sure.

8 Q. I've got a spelling somewhat similar to
9 that.

10 A. Okay.

11 MR. MCGUFFEY: Uh-huh. B, yeah.

12 BY MR. MCGUFFEY:

13 Q. So where are -- where were Dr. Leer and
14 Dr. Oswani? Were they in the same -- what clinic or
15 whatever?

16 A. Oh, Marshfield Clinic.

17 Q. How often did he go in for visits?

18 A. Would -- would you explain -- starting when?
19 Forever or --

20 Q. Let's say while he was working. Did he go
21 in for annual check-ups or anything like that?

22 A. Yes. We -- we always were required. We
23 just went in, yes.

24 Q. And that's in addition to whatever check-ups
25 he might have had at the plant; is that right?

1 A. Well, they had a nurse at the plant, but
 2 those were for little, minor things, if they needed
 3 it.
 4 Q. I was referring to the asbestos screening --
 5 A. Oh.
 6 Q. -- monitoring.
 7 A. Yeah. I'm -- yes. Okay.
 8 Q. Did he have -- did he have permanent hearing
 9 loss?
 10 A. From the Weyerhaeuser noise, yes, he did.
 11 They -- they said he did from that.
 12 Q. Did he wear a hearing aid?
 13 A. He did, which Weyerhaeuser provided. They
 14 paid for them.
 15 Q. Was that -- was that through a worker's comp
 16 claim or something like that?
 17 A. I -- I don't know. I just know that it was
 18 taken care of.
 19 Q. You didn't have to pay for it?
 20 A. No, we didn't. But they declared it was
 21 from the machine --
 22 Q. Uh-huh.
 23 A. -- the noise.
 24 Q. Do you know who his doctor was for, like,
 25 hearing checks and all that sort of stuff?

1 A. He actually went -- it was a hearing place
 2 downtown. Donald Kaiser Hearing.
 3 Q. Did he have -- you said he wore hearing
 4 aids. Did he have -- did he ever have to get them
 5 replaced? Or when did he start wearing them?
 6 A. He's had them replaced twice they did
 7 because his hearing deteriorated.
 8 Q. Did he start wearing them while he was
 9 working there?
 10 A. Oh, yes, yes.
 11 Q. And then let me ask you about a couple of
 12 other -- couple of other sort of less important
 13 things.
 14 Did he have hip problems?
 15 A. Yes.
 16 Q. Do you know when that started?
 17 A. He complained of that for a number of years.
 18 He had flat feet. And they attributed part of it to
 19 that and standing all day at work. But it never
 20 needed any surgery. It was just here and there. It
 21 was a -- kind of a chronic thing. He'd go and get --
 22 they'd give him some pain medication. And it never
 23 affected, you know, too much his living.
 24 Q. Okay. And then in 2006, he was diagnosed
 25 with mantle cell lymphoma; is that right?

1 THE COURT REPORTER: With what?
 2 MR. MCGUFFEY: Mantle cell. It's
 3 M-A-N-T-L-E cell lymphoma, L-Y-M-P-H-O-M-A.
 4 THE WITNESS: Correct.
 5 BY MR. MCGUFFEY:
 6 Q. Was the diagnosis in 2006, or was it prior
 7 to that?
 8 A. I don't know. It's -- that would be eight
 9 years. That -- that's --
 10 Q. And is that when he started going to --
 11 we're going to get -- we're -- we're just going to
 12 come up with our own pronunciation. Bseiso?
 13 A. Yes.
 14 Q. Dr. Bseiso?
 15 A. Yes.
 16 Q. How did they treat his lymphoma?
 17 A. He -- until he went into remission, every
 18 three weeks, he would be hospitalized for chemo
 19 treatments. And he'd be up there three, four, five
 20 days, depending how long it took to distribute all --
 21 get all of the intense, you know -- he was on chemo
 22 and other medication.
 23 He'd come home. He'd be on daily pills
 24 that was -- had to be picked up for in between.
 25 Three weeks later, he'd go back.

1 And that lasted from, I believe,
 2 October until April when he went into remission.
 3 After that --
 4 Q. April of the next year?
 5 A. Correct. After that, the first year or two,
 6 every three months, he'd have CAT scans. He'd also
 7 be on a supplemental chemo. For two years, that went
 8 on.
 9 And he was -- always had -- he'd be
 10 x-rayed once a year. At the end, twice. He'd go in
 11 to make sure it didn't come back, which it never did,
 12 that kind.
 13 Q. How often did he go in for supplemental
 14 chemo treatments over those two years?
 15 A. For two years? Every three months.
 16 Q. Can you tell me what going through chemo was
 17 like for him?
 18 A. Actually, he tolerated it well. He did,
 19 which was unusual, they said, because it was a tough
 20 treatment. Very lethargic and tired but --
 21 And his white count would be zero. So
 22 we had to stay away from everybody, including our own
 23 kids. They had to -- because his immune system was
 24 zero. They'd have him in a special room because he
 25 was very -- very easily would catch anything that

1 would be out there because his -- his white cells
 2 were so -- they were down to zero.
 3 Q. Did he lose weight or anything like that?
 4 A. No. He ate -- he never missed a meal. The
 5 doctors always said, you forgot to eat your dishes,
 6 which is very unusual.
 7 THE VIDEOGRAPHER: Ma'am, could you
 8 slide that up a little bit? It just flopped over.
 9 THE WITNESS: Oh, okay. Sorry.
 10 THE VIDEOGRAPHER: No. That's okay.
 11 Thank you.
 12 THE WITNESS: You're welcome.
 13 BY MR. MCGUFFEY:
 14 Q. How big is -- how big was your husband?
 15 A. Medium build. He never fluctuated between
 16 170, 173, '4.
 17 Q. How tall is he?
 18 A. He started out 5'10. He -- he was about 5'7
 19 when he passed away.
 20 Q. Do you remember the other medication that he
 21 was on while he was going through chemo?
 22 A. I -- one was to protect his stomach. It was
 23 over-the-counter, like a -- some of it was to protect
 24 his organs.
 25 Q. Uh-huh.

1 A. I -- I don't -- I can't -- I could guess,
 2 but I won't do that.
 3 Q. Right. He -- so -- so for two years, he
 4 goes through CAT scans and supplemental chemo every
 5 three months; is that right?
 6 A. Right. For two years, yep.
 7 Q. And then he had x-rays --
 8 A. The CAT scans.
 9 Q. -- annually?
 10 A. Twice a year.
 11 Q. Uh-huh.
 12 A. Right. Yes, he did. Every six months,
 13 he -- his doctor thought to keep on top of things.
 14 Q. All right. So that would have been in
 15 roughly 2009 that he stopped those?
 16 A. Well, he was having CAT scans right up to
 17 his -- actually, until he passed away.
 18 Q. How often did he go in for check -- what --
 19 let me back up.
 20 A. Okay.
 21 Q. Where did he go for these check-ups?
 22 A. At our clinic.
 23 Q. Marshfield Clinic?
 24 A. Yes.
 25 Q. Is that where Dr. Bseiso is as well?

1 A. Yes. And the hospital too. We -- they're
 2 right next to each other. The hospital, he had the
 3 same doctor.
 4 Q. What hospital was that?
 5 A. Ministry, Saint Joseph's. Ministry.
 6 It's -- it was Saint Joseph's back then, though.
 7 It's the same hospital.
 8 Q. It's changed names now? Is that what
 9 happened?
 10 A. Right, right.
 11 Q. Okay. So in 2000 -- so even after 2009, he
 12 would go in for check-ups; is that right?
 13 A. Yes.
 14 Q. Do you know how often he was going back?
 15 A. Every six months.
 16 Q. Did he also have -- did he also visit the
 17 VA?
 18 A. Yes, he did once here.
 19 Q. Do you know who his physician was at -- at
 20 the VA?
 21 A. He never saw an --
 22 Q. Nurse check-ups?
 23 A. Nurse check-ups. And that was just to keep
 24 him in the system --
 25 Q. Right.

1 A. -- because of Medicare. They -- they did
 2 nothing otherwise for him. It was just a check-up.
 3 MR. MCGUFFEY: Okay. Why don't we do
 4 this? He's -- he's telling me -- we -- can we take,
 5 like, a five-minute break? We're going to do
 6 restrooms. And I'm going to grab a couple of things
 7 just to set in front of you. Will that work?
 8 THE VIDEOGRAPHER: We're off the
 9 record. End of DVD 1. The time is 10:23.
 10 (A recess was taken.)
 11 THE VIDEOGRAPHER: We are back on the
 12 record with DVD No. 2. The time is 10:39.
 13 BY MR. MCGUFFEY:
 14 Q. Ms. Pecher, I believe you have a statement.
 15 A. I am somewhat challenging his date that he
 16 started work. They have -- and I know I did speak to
 17 Weyerhaeuser in Washington. This was the date they
 18 told me that he was hired, 3/23 of '56. Some of the
 19 other records go back '53 and '54. I just wanted to
 20 say -- and that's what they -- there's three
 21 different starting dates for him.
 22 Q. Okay.
 23 A. Okay.
 24 Q. Do you know -- do you have any recollection
 25 or -- or -- of what he did during that time frame,

1 the '53 to '56?

2 A. No. That was his hire date supposedly.

3 It's on -- I've got some paperwork that was --

4 Q. Right.

5 A. I -- I don't -- and I did not know him, so

6 I -- but I just -- this '56, I still don't know him,

7 but that's a challenged date.

8 Q. That seems late to you?

9 A. Yes, it does.

10 Q. Okay.

11 A. From what his family has said. And, you

12 know -- I -- but that's -- I have no -- nothing, you

13 know -- so I just thought I'd bring that up.

14 Q. No problem.

15 A. Okay.

16 Q. We're going to kind of continue going

17 through some medical history.

18 A. Okay.

19 MR. MCGUFFEY: I'll have you mark --

20 (Deposition Exhibit No. 6 marked for

21 identification.)

22 BY MR. MCGUFFEY:

23 Q. What I'm going to hand you next is a -- is

24 doctor's notes from -- from Marshfield Clinic. And

25 this was when -- this was from a check-up in 2012,

1 just one of his check-ups with one of the doctors at

2 Marshfield Clinic. And in particular, I want to just

3 take a look at --

4 MR. MCGUFFEY: Actually, I think I had

5 you mark the wrong one.

6 One second. I had her mark -- I think

7 I had her put a note on the wrong thing.

8 THE COURT REPORTER: Do you want a new

9 sticker?

10 MR. MCGUFFEY: You know what? I think

11 I printed the wrong thing, more accurately. Yes.

12 We're actually going to skip ahead, and

13 we're going to go to June 2013.

14 BY MR. MCGUFFEY:

15 Q. And this is a medical report from

16 Dr. Bseiso. And I just want to have you take a quick

17 look through this. And then we'll -- then I'll have

18 some questions. In particular, can I have you look

19 at the "History of Present Illness" section and

20 his -- on page 2, there's a list of medical problems.

21 And then we'll move from there.

22 A. Okay. Thank you.

23 Q. So my questions -- I'll start with the

24 "History of Present Illness." This -- because of his

25 consulting with his oncologist, it's not surprising

1 that they're addressing his mantle cell lymphoma.

2 A. Yes.

3 Q. And my question is just a few things about

4 the history of it. It says that there was a problem

5 with bone marrow. Do you recall anything about

6 that?

7 A. Yes. That had metastasized to his bone

8 marrow already. That was Stage 4 then.

9 Q. Uh-huh. Did he have -- was -- was that true

10 in 2006, 2007? Is that what he was getting treated

11 for?

12 A. Yes, you're right.

13 Q. All right.

14 A. The original.

15 Q. Did it have -- did -- did it cause any

16 problems as far as pain in his bones, joints,

17 anything like that?

18 A. The biopsy site caused him discomfort for a

19 few months. I don't re- -- I don't remember if he

20 complained about bone aching. He did at times, but

21 you think it's because you're getting older.

22 Q. Did he -- when he went in in June of 2013 --

23 A. Yes.

24 Q. -- how was he feeling?

25 A. Not well. He was more lethargic, tired,

1 listless. Just was losing interest in, you know --

2 in general living. Fishing was starting to stop.

3 Didn't want to go anywhere. Even when our kids

4 visited, the children, grandkids, he would fall

5 asleep. Slept a very lot. Very tired all the

6 time.

7 Q. One of the things that is -- one of the

8 things that's listed in his "Present Illness" section

9 is that he has diffuse adenopathy.

10 MR. MCGUFFEY: I'll spell it later.

11 BY MR. MCGUFFEY:

12 Q. And that, from what I understand, is swollen

13 lymph nodes; right?

14 A. It was in the lymph nodes. The mantle

15 cell -- the top of the lymph nodes, the mantle of the

16 lymph nodes. That's what they said.

17 Q. Was he having any -- was he having any

18 swelling in his lymph nodes in 2013?

19 A. None that we would see, you know. We -- it

20 wasn't noticeable.

21 Q. When he went in to see Dr. Bseiso, did -- in

22 June of that year, did he say anything different than

23 the normal check-ups?

24 A. It was questionable. He apparently said he

25 was more tired, but that was his routine check-up in

1 June.
 2 Q. Did he want to see him back again?
 3 A. He said, if you have anything that you feel
 4 you need to be seen, anytime you call, and we will
 5 see you right away.
 6 Q. Were his normal check-ups generally twice a
 7 year?
 8 A. Yes, yes.
 9 Q. Do you recall -- if you'll look on page 3 of
 10 that document, you'll see a section that says "Plan."
 11 A. Okay.
 12 Q. Do you recall why he wanted to see him in
 13 three months as opposed to in six months?
 14 A. That June, there was -- on -- on the CAT
 15 scan, there was a small area that was questionable,
 16 but this had happened also in the past. And in his
 17 next -- he'd have him come in a little sooner.
 18 Q. Uh-huh.
 19 A. It would be okay. But he did -- he did
 20 mention that there was a little questionable area in
 21 his -- in his stomach. And that was in June. But
 22 he -- and then he set one up for three months. Well,
 23 he was not -- he wasn't here any longer.
 24 Q. And if you look on page -- if you look on
 25 page 1 actually -- or page 2 actually, there's an

1 "Observation" section that lists past -- the top --
 2 the top of page 2.
 3 A. Okay.
 4 Q. It lists past check-ups. Those -- those
 5 dates, I'm assuming, are his -- those treatment dates
 6 from 2000- -- from the supplemental chemo; is that
 7 right?
 8 A. Would you rephrase that?
 9 Q. Do you see the dates running kind of across
 10 just above where the word "Observation" --
 11 A. Yes, I do.
 12 Q. Are those the dates of his supplemental
 13 treatments, chemo treatments?
 14 A. Well, they -- every three weeks, he would be
 15 hospitalized.
 16 Q. Okay. Did he have -- I'm seeing it one
 17 other place, and I think we'll actually get to it.
 18 Did he have any signs of dementia?
 19 A. Yes.
 20 Q. Do you know when that started?
 21 A. It was a progression. I can't tell you
 22 exactly when, but it was a slow -- yes, he was
 23 becoming more forgetful.
 24 Q. Did that have any effect on sort of quality
 25 of life day to day?

1 A. I don't -- I don't think so. He still
 2 enjoyed that part of it. He said, I -- I just am
 3 forgetting.
 4 Q. He was aware -- he was aware that he was
 5 forgetting?
 6 A. Yes, he was. Yes.
 7 Q. I just want to make sure --
 8 Now, the next that I'm going to mark
 9 for you begins in July of 2013. These are more
 10 medical reports in July. And this would have been
 11 July 23rd.
 12 (Deposition Exhibit No. 7 marked for
 13 identification.)
 14 BY MR. MCGUFFEY:
 15 Q. Now, before we kind of get into anything on
 16 the document, can you give me everything you remember
 17 about how it was that he came to be diagnosed with
 18 the abdominal cancer?
 19 A. He had an appointment set up at the VA
 20 clinic for his yearly. He went there. They thought
 21 he had an appendicitis attack. They sent him back
 22 immediately to the emergency room that -- the nursing
 23 staff there.
 24 When we went there, they did some
 25 testing, and they admitted him to the hospital. And

1 that's when they, you know, did a -- they dec- --
 2 decided that's what it was, the cancer.
 3 Q. Was he having -- actually, if you'll take a
 4 look at the first page of that exhibit, the line
 5 under "History of Present Illness" --
 6 A. Okay.
 7 Q. -- it starts -- I believe it's the third
 8 sentence. It says, "The patient and his wife state
 9 that he has abdominal pain and thus sent to the" --
 10 wait. Sorry. -- "state that he has had abdominal
 11 pain and blocking" -- "and bloating for approximately
 12 two and a half weeks, decreased appetite, increased
 13 lethargy, and dehydration."
 14 A. Correct.
 15 Q. Is that over and above -- you've testified
 16 earlier that he -- he had been having symptoms for
 17 two years. Is that over and above what had
 18 happened --
 19 A. Yes.
 20 Q. -- before?
 21 A. This is -- yes, it was.
 22 Q. Did he have -- was he having any other
 23 problems as far as just -- it was just water
 24 retention, or was it --
 25 A. Well, he was so bloated, I -- as I explained

1 at the -- our dau- -- granddaughter's wedding, he --
2 he was full. He -- he just was -- always said he was
3 full. He thought it was in his -- he said -- he said
4 it was gas. Well, it wasn't.

5 Q. Did you raise his lack of appetite with
6 Dr. Bseiso in June?

7 A. It started a little bit for him, but he just
8 said, well, that's, you know -- that's the way it is.
9 But his appetite decreased rapidly.

10 Q. From June to July?

11 A. It did actually.

12 Q. And it describes his pain as a three out of
13 ten, if you see that next line, after the two and a
14 half weeks.

15 A. He had a lot of tolerance for pain because
16 he was really uncomfortable. But is that what he
17 said? Three out of ten? Okay.

18 Q. Yeah. I mean, that's kind of my question.
19 What -- what was it -- what was it like for him in
20 the week leading up to his VA appointment or
21 something like that?

22 A. Again, it was lack of appetite, dehydration,
23 stomach -- real severe stomach problems. Gas, as he
24 called it. His stomach started getting bigger. And
25 he was always very trim.

1 Q. Uh-huh.

2 A. And that's why they thought it was an
3 appendicitis attack. And it -- and it wasn't. It
4 was -- then they went through all the testing and
5 found this.

6 Q. In July when he -- when he comes in to
7 the -- to the emergency room, was -- did he start
8 getting treated at that point? Did they make -- did
9 they -- did the hospital make a diagnosis of -- of
10 cancer?

11 A. They admitted him right away. They admitted
12 him.

13 Q. Did he start treatments at that point?

14 A. He was up there approximately over a week.
15 They were doing biopsy after biopsy trying to connect
16 the mantle cell --

17 Q. Uh-huh.

18 A. -- with the stomach cancer. And they -- it
19 was always negative. And they sent him home
20 approximately a week later. And he just -- just went
21 downhill very fast.

22 Q. Did he start chemotherapy again?

23 A. He had one treatment. One treatment. I --
24 I can't tell you when it was --

25 Q. Right.

1 A. -- exactly.

2 Q. Was he -- if you'll let me -- I assume it
3 will be easier if I just turn it to you.

4 So this is -- the next portion of this
5 is from the day of his discharge. And he has -- it
6 describes him as roughly how you -- how you have
7 described him. But the -- the question that I had is
8 that, on page 2 at the top, it says, "Mr. Pecher was
9 able to be discharged. There was some improvement in
10 his symptoms, though, a definite diagnosis unknown
11 during this time." Did he improve while he was at
12 the hospital? Is that -- is that right? Was he
13 feeling better when he came home?

14 A. No. He needed a walker to walk.

15 Q. Uh-huh.

16 A. And I had to stand by, helping him. That
17 was not him. He was weak.

18 Q. Was he having less -- less bloating, more
19 increased --

20 A. No.

21 Q. -- appetite, anything like that?

22 A. No. His appetite was two to three bites
23 sometimes in a day. And they also removed fluid from
24 his stomach several times to relieve some of the pain
25 and the pressure.

1 Q. Do you know any of the -- any of the doc- --
2 the hospital doctors that he -- that he went to
3 during that time?

4 A. Well, his own doctor was not there.

5 Q. Right.

6 A. He was gone. Dr. Fagbemi was one of them.

7 Q. Do you know Dr. Wayne Thorne? Is that
8 right?

9 A. That I'm -- no.

10 Q. Dr. Jessica Marshall?

11 A. Yes. I re- -- I recall her name. But they
12 only were brief on-call. They'd come in, and they'd
13 leave.

14 Q. So he -- he's discharged in July -- on July
15 30th. And then the next -- the next sort of medical
16 report we have is from August 16th.

17 A. Yeah.

18 Q. What was the change? What -- was it sudden?
19 Was it over -- gradual over two weeks? What
20 happened?

21 A. It'd deteriorate definitely every day. He
22 just became worse. He was -- he did have his chemo
23 treatments. I think that was on a Thursday. I can't
24 give you a date. And he tolerated that good. He was
25 okay. He came home.

1 And then from then on, we had to admit
2 him on that Friday night. And he passed away on
3 Sunday.

4 Q. Do you know who his treating physician was
5 over the weekend?

6 A. They were see- -- Dr. Fagbemi, I think, was
7 there. And Dr. -- she ordered -- they --

8 Q. Dr. --

9 A. I'm trying to --

10 Q. -- Mali? Does that sound familiar?

11 A. They --

12 Q. M-A-L-I.

13 A. That could be because I never knew any of
14 them so...

15 He was so dehydrated. They were trying
16 to hydrate him, and -- and they had some problems.
17 So he was very dehydrated. He did throw up and
18 severe diarrhea.

19 Q. Was he complaining of more pain in the -- in
20 that two-week window, July 30th --

21 A. Yes --

22 Q. -- until --

23 A. -- he did. Yes.

24 Q. So the -- so he passed away. And they did
25 not have a definitive diagnosis at the time of death;

1 is that right?

2 A. Oh, they knew he had the cancer.

3 Q. They knew he had cancer.

4 A. But they didn't know where the primary site
5 was. They never found that.

6 Q. From what I've seen - and I actually don't
7 have it sitting in front of me - the autopsy report
8 was done months later; is that right?

9 A. Hours later.

10 Q. Okay.

11 A. He was cremated. And it -- you have to wait
12 48 hours for cremation. And it was done between that
13 and --

14 Q. So the autopsy was done in the hospital?

15 A. No, it wasn't done there. It was done at
16 the funeral home.

17 Q. How did you -- the -- the autopsy report
18 I've seen is a doctor named Dr. Staggs.

19 A. I -- I can't tell you any of that. We -- I
20 have no -- no information on that at all.

21 Q. Did you request the autopsy?

22 A. Yes.

23 Q. We're going to shift gears and talk a little
24 bit about sort of the community exposure that you
25 discussed with Mr. McCoy.

1 When you lived in Wausau on -- what was
2 the air like up there?

3 MR. MCCOY: Compared to -- compared to
4 a certain place or what?

5 MR. MCGUFFEY: Generally.

6 MR. MCCOY: Okay.

7 THE WITNESS: As I can recall, good,
8 you know, fresh, clear.

9 BY MR. MCGUFFEY:

10 Q. Did you observe any dust from the plant in
11 Wausau, from the Marshfield plant?

12 A. Oh, no.

13 Q. Okay.

14 A. No.

15 MR. MCCOY: I think the distance is
16 about 30 miles up to there so...

17 THE WITNESS: From Marshfield to Wausau
18 is almost 50.

19 MR. MCCOY: 50? Okay.

20 THE WITNESS: Yeah.

21 BY MR. MCGUFFEY:

22 Q. When you lived in Stratford, what was the
23 air like there?

24 A. It seemed okay, to my recollection.

25 Q. Did you observe any dust from the -- from

1 the Marshfield plant in Stratford?

2 A. Not that I can recall, no.

3 Q. At the time that you moved to North Peach --

4 A. Yes.

5 Q. -- I think is 1969. Were there any dirt
6 roads in town in Marshfield at that time?

7 A. Not where we lived.

8 Q. Not -- not outside the plant?

9 A. I don't know. Beside the plant?

10 Q. Yeah. Near the plant. Anywhere near the
11 plant.

12 A. I don't know. I -- I can't answer. I don't
13 know if their parking lots were dirt. I don't
14 know.

15 Q. Could you see the plant from your house?

16 A. No, no. You could see the upper -- like,
17 the smoke stack above.

18 Q. Right.

19 A. Yeah. That we saw.

20 Q. Does it generally look like it does today as
21 far as your view from your home, what you would have
22 seen?

23 A. It should be the same. Yeah, I would say.

24 Q. So when you saw dust, could you have
25 pinpointed it to a specific location in the plant?

1 A. In the plant?
 2 Q. Right.
 3 A. No. We just saw what came out from the
 4 outside.
 5 Q. Just generally from --
 6 A. Right.
 7 Q. -- the direction of --
 8 A. I --
 9 Q. -- the plant?
 10 A. I don't know exactly.
 11 Q. Did you ever have testing done on the dust
 12 on your home or --
 13 A. Personally, no, we did not.
 14 Q. Do you know anyone who did?
 15 A. No, I do not know.
 16 Q. Do you know if anyone from the plant ever
 17 came and did testing near you?
 18 A. I don't know. I can't --
 19 Q. Do you know what was in the dust?
 20 A. Pers- -- no, I don't know what was in it.
 21 No.
 22 Q. And you testified earlier that -- that the
 23 dust in the community got better in 1980?
 24 A. Well, past '80. I couldn't give an exact,
 25 but it just -- gradually, it seemed to dissipate,

1 disappear. I couldn't say an exact date, but it did
 2 eventually.
 3 Q. Starting around '80, '81 --
 4 A. I would say --
 5 Q. -- '82?
 6 A. -- after that. Because they -- they -- they
 7 did something in the -- the whole business. They had
 8 to re-do everything. They had to add some, you know,
 9 things to get rid of it.
 10 Q. Right. What's the name of your local
 11 newspaper?
 12 A. Marshfield News Herald.
 13 Q. Is that the paper that you recall seeing
 14 write-ups about the plant and changes at the plant?
 15 A. Yes.
 16 Q. Did you and Mr. Pecher attend church?
 17 A. Yes.
 18 Q. Where is your church?
 19 A. St. John's Catholic Church in Marshfield.
 20 Q. Where is it located in Marshfield?
 21 A. On Blodgett. I believe that's the address.
 22 It's close by, about eight blocks.
 23 Q. Where is that in relation to the plant?
 24 A. It's almost straight across -- you go to
 25 the -- it would be to the west of the plant, almost

1 straight over.
 2 Q. Do you know about how far?
 3 A. Well, it's about fi- -- the church is about
 4 five blocks from our house. So about eight,
 5 somewhere in there.
 6 Q. Did you observe dust at the church?
 7 A. No, no. I can't say I did.
 8 Q. Would you have said the air quality there is
 9 better than it was at your home in the '60s and '70s?
 10 A. I wasn't there a whole -- I mean, it was an
 11 hour or so a week. I -- I don't know. I -- I can't
 12 answer that. I would say yes because everything was
 13 closed in church usually.
 14 Q. Mr. Pecher worked with the Boy Scouts?
 15 A. Yes, he did. You do have your history.
 16 Q. Was that -- was that also in the church?
 17 Did they --
 18 A. It was in our home. And we did have
 19 meetings up there also, our monthly meetings.
 20 Q. Okay. When you lived near here, the -- the
 21 Maple address --
 22 A. Okay.
 23 Q. -- in Marshfield --
 24 A. Right.
 25 Q. -- did you -- do you ever recall seeing

1 Weyerhaeuser waste trucks driving past your home?
 2 A. Because it was next to the tracks, it would
 3 have been on the other side of our apartment. No, I
 4 do not.
 5 Q. When you lived in Stratford, do you recall
 6 seeing Weyerhaeuser -- Weyerhaeuser waste trucks
 7 driving past your home?
 8 A. No, because we were not on the highway.
 9 Q. When you moved to Peach Avenue, do you
 10 recall seeing Weyerhaeuser waste trucks driving past
 11 your home?
 12 A. No, I don't. Never paid attention. I don't
 13 know.
 14 Q. Do you know what the truck that Mr. Pecher
 15 drove looked like?
 16 A. No, I don't. I never saw it, no. I know he
 17 descri- -- it was a big dump truck, but I never saw
 18 it.
 19 Q. If you could take Exhibit 4 -- that is the
 20 interrogatory responses.
 21 A. This one?
 22 Q. Uh-huh.
 23 A. Right.
 24 Q. Let me just -- you testified earlier that
 25 you had seen it before, is that correct, that

1 document? Is it -- maybe we're looking at the wrong
2 thing.
3 A. Not this I haven't seen.
4 Q. Exhibit 4, the -- the --
5 A. This is the names? I didn't see this.
6 Q. The long interrogatory.
7 A. Would that be the -- way down here?
8 Q. I bet you it's that stapled copy right here.
9 A. Oh, okay. Because I didn't --
10 Q. There we go.
11 A. -- see that one. All right. I -- I have
12 it.
13 Q. And have you seen that before?
14 A. This one?
15 Q. Yes.
16 A. Yes, I have.
17 Q. And did you provide information for what's
18 inside?
19 A. Yes, I did.
20 Q. Do you know when you did that?
21 A. Weeks ago. I can't give you -- I'm not sure
22 of the date because I -- there's been other things
23 so -- I would say three weeks maybe, a month.
24 Q. When is the first time that you saw that
25 document?

1 MR. MCCOY: Typed up like that?
2 MR. MCGUFFEY: Yes.
3 MR. MCCOY: Go ahead and answer.
4 THE WITNESS: Well, I -- last night I
5 saw it.
6 BY MR. MCGUFFEY:
7 Q. Is that the first time?
8 A. Boy, I -- I don't know. I've been -- like I
9 said, there's others. I don't know if I saw this --
10 I filled it out. I mean, I did, but not typed up. I
11 signed it last night.
12 Q. Okay.
13 A. All right?
14 MR. MCCOY: He's asking you when you
15 saw the typed-up version.
16 THE WITNESS: Last night.
17 MR. MCCOY: Okay.
18 THE WITNESS: Right? That's what --
19 MR. MCGUFFEY: Yeah.
20 THE WITNESS: -- I recall.
21 MR. MCGUFFEY: Yeah. I'm not trying
22 to -- I'm not trying to trick you.
23 THE WITNESS: Okay. Because I -- if I
24 saw it before, I don't recall.
25 MR. MCGUFFEY: No, no.

1 THE WITNESS: Okay.
2 BY MR. MCGUFFEY:
3 Q. Can I get you to turn to page 5?
4 A. The same --
5 Q. It's going to be Interrogatory --
6 A. -- one?
7 Q. Uh-huh. Interrogatory Response No. 6.
8 A. Okay.
9 Q. I just wanted to confirm the statement,
10 "Janet Pecher personally has no information," and
11 it's regarding his asbestos exposure at Marshfield
12 plant. Is that correct?
13 A. That's correct. I don't have any.
14 Q. Are you aware -- when he -- when he was at
15 Lewis -- Fort Lewis --
16 A. Fort Lewis? Yes.
17 Q. -- were you aware of any ways that he may
18 or -- may have been exposed to asbestos there?
19 A. No. They were in, you know -- out --
20 Q. If you would, turn to page 7. And
21 Subsection F, I believe, is at the top of the page.
22 Is that right?
23 A. Okay.
24 Q. There's a statement on there that "Decedent
25 was disabled from many and ultimately all activities

1 starting more than two years before diagnosis."
2 Could you tell me what activities, let's say, two
3 years out that he couldn't do?
4 A. Well, I told you with the fishing. I don't
5 know if that's consi- --
6 Q. When did that start? When did he stop
7 fishing?
8 A. It was a gradual -- a few years. It was
9 just last -- I can't elaborate any more than that.
10 But he would have gone every day, if he could
11 normally.
12 Going for gatherings. He would usually
13 go, but it was very difficult. It was just, you
14 know -- he was tired, so tired and listless. And
15 just -- it was too much.
16 Q. Huh.
17 A. He would -- I mean, because he was very
18 easygoing. He would go, but he would sit a lot of
19 times and just not do much.
20 I ended up doing more and more of the
21 things around -- like, he always managed to cut the
22 lawn. But everything else that normally he'd help
23 with, just fixing dinner, he just didn't do that.
24 Everyday, you know, things.
25 We'd go for walks. They became less.

1 He just didn't want to go.
 2 Like I said, gatherings were harder for
 3 him.
 4 He seemed more, you know -- not
 5 depressed, but just like it's just too much.
 6 Is that enough? I don't know what --
 7 Q. Uh-huh.
 8 A. -- else it would be.
 9 Q. Yeah.
 10 A. Okay.
 11 Q. That's -- that's --
 12 MR. MCGUFFEY: I need you to mark that.
 13 THE WITNESS: He also loved our
 14 grandkids and spent less time with them. It was just
 15 too much. He just --
 16 BY MR. MCGUFFEY:
 17 Q. How many grandchildren do you have?
 18 A. We have four natural and two inherited and
 19 three greatgrands.
 20 (Deposition Exhibit No. 8 marked for
 21 identification.)
 22 BY MR. MCGUFFEY:
 23 Q. The next thing I'm going to hand you is an
 24 exposure summary that was prepared by Mr. McCoy or
 25 his law firm and given to the experts in this case.

1 A. Okay.
 2 Q. Have you ever seen that document before?
 3 A. I don't think so. I -- I don't think I
 4 did.
 5 Q. If you could, just give it a --
 6 A. Okay.
 7 Q. -- give it a glance. And I'm going to ask
 8 you some questions.
 9 A. Okay. I --
 10 Q. So my first question is, did you assist Mr.
 11 McCoy or anyone in his firm in preparing that?
 12 A. Well, with the information, but not -- not
 13 next to, you know --
 14 Q. Right.
 15 A. No, I did not.
 16 Q. So I just have a few quick questions
 17 about --
 18 A. All right.
 19 Q. -- some things within it.
 20 When you lived at the -- the -- the
 21 nearby address, we'll say Maple or 8th --
 22 A. All right.
 23 Q. -- Street or whatever --
 24 A. Sure.
 25 Q. -- do you know where Weyerhaeuser was

1 disposing of waste at that time?
 2 A. It was northeast from there a little bit.
 3 Is that what you mean, the -- the --
 4 Q. I'm -- I'm just asking if you know what --
 5 because they used a number of -- of waste disposal
 6 sites.
 7 A. Oh, no. I didn't know where they were. No,
 8 I don't.
 9 Q. Would the same be true in Stratford? Do you
 10 know with what --
 11 A. No, I don't.
 12 Q. Okay. The -- if you look under the
 13 community section --
 14 A. Okay.
 15 Q. -- one, two -- the fourth paragraph, first
 16 line is, "Dust from the plant could be smelled in the
 17 air." Can you tell me what it smelled like?
 18 A. Stuff. On the -- on the worst days, it was
 19 almost like -- like a dust, like you're in -- in a
 20 dust -- in a -- in a room that's not clean, the air.
 21 It just had a very definite odor to it.
 22 Q. The laundry being hung outside, you said
 23 that you stopped doing that?
 24 A. Yes, I did.
 25 Q. How long did you do it? You moved there in

1 '69. How long did it convi -- did it take to
 2 convince you that you --
 3 A. It took me a while. I -- it -- because I
 4 always hung sheets out. I just stopped doing that
 5 because they had to be rewashed anyhow. So --
 6 Q. Uh-huh.
 7 A. -- then I'd just use the dryer all the time
 8 after that.
 9 Q. You had a clothes dryer?
 10 A. Oh, sure. All the time. But I prefer the
 11 fresh air smell. But I -- that's why I would -- no.
 12 After that, I just quit just because it had to be
 13 redone. Whatever I put out had to be relaundered.
 14 Q. Do you know when you quit?
 15 A. No, I don't.
 16 Q. Okay.
 17 A. I'm sorry.
 18 Q. Do you believe that you are -- that you or
 19 Mr. Pecher were exposed to dust from the plant at --
 20 at your church, St. John's?
 21 MR. MCCOY: We object to the --
 22 THE WITNESS: Yeah.
 23 MR. MCCOY: -- form of the question.
 24 She's obviously not a scientist in this.
 25 But you can go ahead and answer what --

1 what you think.
 2 BY MR. MCGUFFEY:
 3 Q. That's right. Do you believe that you were
 4 exposed to asbestos? You or your husband at the --
 5 at the church?
 6 A. I honestly can't -- I can say no -- I don't
 7 know. I -- I -- it's not something I ever thought
 8 about, so I will say I don't know.
 9 Q. When it says here that the Scouts got cut
 10 wood pieces from the door plant --
 11 A. Yes, they did. He would bring them -- bring
 12 them home and --
 13 Q. Actual lumber pieces?
 14 A. Yes. They donated them.
 15 Q. Do you ever recall hearing -- hearing him
 16 bring home pieces or shards of mineral core for the
 17 Scouts?
 18 A. He would bring home various pieces of wood
 19 because they would do projects. I -- I can't answer
 20 that. He'd bri- -- would bring home a lot of wood,
 21 though.
 22 Q. Okay.
 23 A. He always had extra.
 24 (Deposition Exhibit Nos. 9 and 10 marked for
 25 identification.)

1 THE WITNESS: Thank you.
 2 BY MR. MCGUFFEY:
 3 Q. What you've been handed are case-specific
 4 expert reports for your claims. Have you ever seen
 5 either of those reports?
 6 A. No.
 7 Q. Have you ever met or spoken with Dr.
 8 Anderson or Frank Parker?
 9 A. Dr. Anderson?
 10 Q. Henry Anderson is his name.
 11 A. No, it doesn't ring a bell.
 12 Q. I'm going to ask some -- some --
 13 MR. MCCOY: I don't know that she's
 14 finished her answer yet.
 15 THE WITNESS: This name I recognize.
 16 This --
 17 BY MR. MCGUFFEY:
 18 Q. Which one is that?
 19 A. The Caliche or whatever that is. This one.
 20 That I -- I do.
 21 Q. Do you know the name -- if you'll turn to
 22 the last page -- or not the last page. Sorry. Let
 23 me find it.
 24 Page 6. Do you know Frank M. Parker,
 25 the Third?

1 MR. MCCOY: I don't know if she knows
 2 him.
 3 THE WITNESS: I don't know him, no.
 4 BY MR. MCGUFFEY:
 5 Q. You've never met him?
 6 A. I've never met him, no.
 7 MR. MCCOY: She's talked to him.
 8 THE WITNESS: Yeah. I have spoken to
 9 him, but I've never met --
 10 BY MR. MCGUFFEY:
 11 Q. You spoke to Mr. Parker?
 12 A. Yes.
 13 Q. I'm going to ask some -- now I'll get to my
 14 tedious questions. We're going to -- I'm going to
 15 ask you about other plaintiffs in these cases.
 16 Do you know Milton Boyer?
 17 A. I've heard the name. I don't know him,
 18 no.
 19 Q. What about his father, Wally Boyer?
 20 A. I knew him.
 21 Q. And what can you tell -- tell me about
 22 Mr. Boyer?
 23 A. Nothing much. I just knew -- I knew who he
 24 was.
 25 Q. Dick Masephol?

1 A. No.
 2 Q. Emil Masephol, his father?
 3 A. No, I don't.
 4 Q. Leroy Treutel?
 5 A. Yes.
 6 Q. What can you tell me about -- about
 7 Mr. Treutel?
 8 A. He was a brother to my uncle. So I -- but
 9 we didn't know him very well. We just -- I knew who
 10 he was and his wife.
 11 Q. You knew Rita as well?
 12 A. Yes, I did.
 13 Q. Also just acquaintances, or were you friends
 14 or anything like that?
 15 A. If we'd meet in the store, we knew each
 16 other, you know. But we never did anything socially,
 17 no.
 18 Q. Ayle Heckel?
 19 A. No.
 20 Q. Sharon Heckel?
 21 A. Yes.
 22 Q. What can you tell me about her?
 23 A. She came to the retiree's breakfast that my
 24 husband would go. And I just saw her there. I just
 25 knew who she was. That's all.

1 Q. Their son, Brian Heckel?

2 A. I know who he is, but I don't know him. I

3 mean, I know who he is.

4 Q. Roger Seehafer?

5 A. Yes. I just knew who he was.

6 Q. Did you know who some of these people were

7 because they worked at the plant?

8 A. Some because Urban would mention some of

9 them. But strictly, you know, I -- socially, no, not

10 at all.

11 Q. Wes Sydow?

12 A. Yes, I knew him.

13 Q. What was your relationship there?

14 A. I worked with his wife at one point. Did

15 not know him, though. I knew who he was.

16 Q. Ron Koepke?

17 A. I knew who he was by name only.

18 I only recognize these names.

19 Q. Did the dust outside the home prevent you

20 from using your car?

21 A. No, no.

22 Q. Did you ever resell a car?

23 A. Trade in. Trade in, sure.

24 Q. Did it have an impact on the value?

25 A. We pretty much used them up. No. I

1 don't -- I don't know.

2 Q. Driving them hard --

3 A. Yeah.

4 Q. -- impacts the value, huh?

5 A. Right.

6 Q. Have you had any issues yourself with

7 breathing, respiratory problems?

8 A. Not at this point, no.

9 Q. Have you ever consulted a physician about

10 any potential asbestos-related illness?

11 A. To me?

12 Q. Uh-huh.

13 A. No.

14 Q. To the best of your knowledge, have you

15 ma- -- have you or Mr. McCoy or anyone in his office

16 made claims on your behalf or on Mr. Pecher's behalf

17 to bankruptcy trusts?

18 A. No, no.

19 Q. Do you anticipate making such claims?

20 A. No.

21 Q. Have you received any money from worker's

22 comp claims related to --

23 A. No.

24 Q. -- illnesses?

25 A. No.

1 MR. MCGUFFEY: Give me just one second

2 to go back over this, and I think I'm done.

3 Ms. Pecher, unless anything else comes

4 up, I don't have any more questions for you. Thank

5 you very much for your time.

6 THE WITNESS: Thank you. You're

7 welcome.

8 MR. MCCOY: I would stipulate that

9 she's not going to be, for -- for the plaintiffs, a

10 witness concerning 3M.

11 MR. BROWN: Okay. I still have a few.

12 It shouldn't be very long.

13 MR. MCCOY: Okay. Well, then, yeah.

14 If you're planning to call her for any purposes, then

15 obviously that -- she'll -- she'll answer your --

16 your questions. Go ahead.

17 EXAMINATION BY MR. BROWN:

18 Q. All right, ma'am. My name is Kevin Brown,

19 and I just have a few questions. I shouldn't be as

20 long as the Weyerhaeuser attorney.

21 But -- but do you need a short break,

22 or are you okay?

23 A. I'm okay.

24 Q. Okay. When you moved to Marshfield --

25 A. Yeah.

1 Q. -- did you work outside the house?

2 A. Personally? Yes.

3 Q. Yes, ma'am.

4 A. Yes, I did.

5 Q. Okay. And what was your employment?

6 A. When the children were -- before they

7 started school, seasonal at Figi's cheese plant. I

8 worked, like, from September in advertising until

9 Christmas.

10 Q. And what years did you do that?

11 A. Maybe '64, '65, '66.

12 Q. Any other employment for you personally

13 outside the home once you moved to Marshfield?

14 A. Yes.

15 Q. What else?

16 A. 28 years in nursing. I worked at the

17 Marshfield Nursing Center on West 14th.

18 And after that, almost two years at the

19 Aster. It was assisted living. It's on Chestnut.

20 It was the Angelus when I was there.

21 Q. Are you an RN? Are you a registered

22 nurse?

23 A. No.

24 Q. Okay.

25 A. I worked in therapy. I was a CNA. I was --

1 worked in restorative nursing. I had all those
 2 titles. Med tech. Passed out meds.
 3 Q. Okay.
 4 A. Gave shots.
 5 Q. Okay. Any other employment for you
 6 personally, or have we now covered it?
 7 A. That's covered it. I did a lot of volunteer
 8 work too but --
 9 Q. But never related to the door plant?
 10 A. Nothing, never.
 11 Q. And the one and only time you ever stepped
 12 foot into the door plant was in the year 2000 when
 13 your husband had a retirement party?
 14 A. Correct.
 15 Q. Okay. You spoke briefly about your
 16 husband's time in the Army and National Guard. And I
 17 just want to be clear that you know he had some
 18 training and you're aware that he drove a big truck,
 19 but beyond that, you don't have any knowledge or
 20 understanding as to any particular duties or the
 21 substance of any training he got; is that accurate?
 22 A. I would say, yep. He had his training, but
 23 it was six weeks bef- -- and that was all before I
 24 met him, so I don't know.
 25 Q. And -- and if he did anything else beyond

1 driving big trucks, you just don't know?
 2 A. I don't know.
 3 Q. You indicated that you believe he hauled
 4 asbestos waste for the door plant.
 5 A. Yes.
 6 Q. What's the basis for your belief that it was
 7 asbestos waste?
 8 A. Because Urban would say they'd clean out --
 9 I think they called them the bins. I think I'm
 10 correct on that. And it was all -- he was told --
 11 apparently he was told that by somebody. And I'm --
 12 I know that's secondhand, but just what he would tell
 13 me.
 14 Q. Do you know what bins he was claiming he
 15 cleaned out? In other words, other than the fact --
 16 A. From the doors, the doors' cores and
 17 stuff.
 18 Q. Do you have any knowledge or understanding
 19 as to whether or not this waste that your husband
 20 would haul in these trucks was bagged and sealed or
 21 if it was just open in the back of the dump truck?
 22 Do you have any knowledge or understanding either
 23 way?
 24 A. No, I don't.
 25 Q. Did your husband ever indicate to you that

1 he had any type of training or warning from the door
 2 plant specifically concerning hazards of asbestos?
 3 A. No. He would mention how dusty it was in
 4 the environment. And -- and that's -- that's all I
 5 have. It was dusty. He'd come home and --
 6 Q. There wa- --
 7 A. Dusty.
 8 Q. There was never a point in time where he
 9 came home and -- and said, guess what I learned at
 10 the plant today; I'm -- I'm working around some dust
 11 that could cause health problems?
 12 A. Not that I can remember.
 13 Q. You don't have any personal knowledge as to
 14 whether or not your husband ever wore any type of
 15 respiratory protection at the plant, do you?
 16 A. To my knowledge, they did not.
 17 Q. To your knowledge, he did not wear resp- --
 18 A. They didn't have anything to use. They
 19 didn't have it.
 20 Q. And is that something that your husband told
 21 you, that they didn't have any types of masks or
 22 respirators available for him to wear?
 23 A. He just sa- -- because -- yeah. He just
 24 said there was nothing available in the beginning.
 25 I -- I believe at the end, they may

1 have had masks. I don't know. I -- I -- I can't say
 2 for sure.
 3 Q. Okay. So at the beginning, you're aware
 4 that he had no masks or --
 5 A. There was nothing.
 6 Q. -- respirators?
 7 A. Right. There was nothing.
 8 Q. And then whether or not it occurred at some
 9 point later --
 10 A. No.
 11 Q. -- you just don't know either way?
 12 A. No, I don't know.
 13 Q. And your husband never brought any type of
 14 mask or respirator home from the plant with him?
 15 A. Never.
 16 Q. Did your husband have any type of beard or
 17 facial hair while he worked at the plant?
 18 A. No.
 19 Q. Did your husband ever have any type of
 20 radiation treatment for anything?
 21 A. Well, just when they did the chest x-rays.
 22 That would be radiation in there a little bit.
 23 Q. But as far as --
 24 A. Never.
 25 Q. -- therapeutic --

1 A. No.
 2 Q. -- radiation?
 3 A. No.
 4 Q. Okay. Are you aware of whether or not he
 5 was ever exposed to radiation through any means other
 6 than chest x-rays?
 7 A. No, not aware.
 8 Q. You indicated that you were the one who
 9 requested the autopsy.
 10 A. Yes.
 11 Q. Did someone recommend to you or suggest to
 12 you that that should be done?
 13 MR. MCCOY: Let me object to the
 14 extent that that calls for any communications with
 15 counsel.
 16 But you can go ahead and -- and answer
 17 other than discussions that might involve my law
 18 firm. Go ahead if you can -- if --
 19 THE WITNESS: Yes.
 20 BY MR. BROWN:
 21 Q. Okay. So someone advised you?
 22 A. Yes.
 23 Q. Who did you ask to perform the autopsy? In
 24 other words, did -- did you approach someone, or did
 25 you ask someone on your behalf to request it?

1 A. I don't know how to answer that. It was --
 2 a family member suggested it. And this person, my
 3 family member, got in touch with someone that's also
 4 in law, and they were recommended to them. So I did
 5 not have personal contact.
 6 Q. Okay. So a family member recommended to you
 7 that an autopsy be performed?
 8 A. Yes.
 9 Q. Who's the family member?
 10 A. A brother-in-law.
 11 Q. And what's the brother-in-law's name?
 12 A. Bill Heiting, H-E-I-T-I-N-G.
 13 Q. Do you know what kind of job or occupation
 14 Mr. Heiting has?
 15 A. New York Life. He's an agent.
 16 Q. And where does he currently live?
 17 A. In Marshfield.
 18 Q. And so Mr. Heiting came up to you and
 19 indicated that he thought you should have an autopsy
 20 performed?
 21 A. Yes.
 22 Q. And then what's the next step that you took
 23 to get that accomplished?
 24 A. He took care of that part. He contacted
 25 someone in a law office, a friend of his. I don't

1 know who. And then from there, we got calls back.
 2 That's -- I didn't have anything to do with that.
 3 Q. And then when you say you got calls back,
 4 who did you get calls back from?
 5 A. Cascino.
 6 Q. Your current lawyers?
 7 A. Yes.
 8 Q. And the person in the law office that Bill
 9 Heiting contacted, is that someone in a local --
 10 A. No.
 11 Q. -- law firm here?
 12 A. Not here.
 13 Q. Okay. Do you know what city or state that
 14 first law firm --
 15 A. It's in Wisconsin. I'm not sure.
 16 Q. Do you have any information or understanding
 17 as to whether or not Mr. Heiting had already spoken
 18 to this law office before he recommended you get an
 19 autopsy done?
 20 A. No, he did not.
 21 Q. And then whatever the details were with
 22 respect to the logistics of the autopsy, Mr. Heiting
 23 handled that with whatever law firm he was talking
 24 to?
 25 A. He -- after that, he had nothing to do with

1 it. He just -- he was not involved with it after.
 2 Q. But he set it up through communicating with
 3 a law firm.
 4 A. Right. And they contacted him. After that,
 5 he had no knowledge. He still doesn't --
 6 Q. Okay.
 7 A. -- have any knowledge of anything.
 8 Q. Who co- -- who contacted the doctors for the
 9 autopsy? The lawyers?
 10 A. Yes, yes. I know I didn't.
 11 Q. And as far as whatever physician or medical
 12 personnel performed the autopsy, you don't know, do
 13 you?
 14 A. I have -- no, I don't.
 15 Q. Just a few more brief questions.
 16 You indicated that your husband worked
 17 on cars way back when.
 18 A. Correct.
 19 Q. And you indicated that you don't think he
 20 did brake work; right?
 21 A. Not that I can --
 22 Q. Okay.
 23 A. -- recall.
 24 Q. What kind of work did he do way back when on
 25 cars?

1 A. He would do oil changes, put batteries in,
2 you know, new ones, replace them. He was not
3 mechanically inclined. Changed tires. I -- other
4 than that, we pretty much took it to service shops.

5 Q. And you also indicated that there was some
6 home remodeling and additions done?

7 A. Correct.

8 Q. And on the remodeling, you said it was kind
9 of a room at a time that the home was updated?

10 A. New windows, yes.

11 Q. Do you recall when this remodeling work
12 first started? And if you can't give me a specific
13 year, just the best estimate.

14 A. Probably maybe ten years, eight years after
15 we had moved in.

16 We replaced windows twice actually. We
17 replaced them twice.

18 Tore some walls out and made the rooms
19 bigger, one of them.

20 Q. And so is this approximately in the late
21 '70s?

22 A. I would -- yes.

23 Q. On the walls that you and your husband tore
24 out of this home, do you recall, were they sheetrock?
25 Or what were the walls made of?

1 A. Plaster. And most of it, we did have
2 contracted out. We didn't do it ourselves very
3 much.

4 Q. When you say very much, does that indicate
5 that you -- you and your husband tore out some but --

6 A. Well, no. I would -- I would paint, you
7 know. And he would help them, like, install the
8 windows. He would stand by, assist.

9 Q. Did your husband participate at all in any
10 of the tear-out?

11 A. Removal of the windows, but they replaced
12 them. We had them all customized, so they had to
13 just push them right back in the same spot.

14 Q. What about the tear-out of the walls? Did
15 your husband participate at least some in that
16 process?

17 A. He helped carry the waste out or, you know,
18 the stuff, yes.

19 Q. Do you recall how long of a period of time
20 this wall-removal process took?

21 A. Day or two.

22 Q. And was this something that was repeated for
23 other rooms in the house?

24 A. Just downstairs. Upstairs remained the
25 same.

1 Q. How many rooms downstairs were there where
2 walls were removed?

3 A. Just the one. It was about a four-foot
4 wide -- four-by-eight maybe.

5 Q. And then what was replaced? Was it
6 sheetrock walls that were replaced, or did the wall
7 just --

8 A. Nothing. We took it out and --

9 Q. Okay.

10 A. -- just -- sheetrock was put in, but that
11 space was left open.

12 Q. Your husband didn't wear any type of
13 respirators or masks when doing the tear-out work,
14 did he?

15 A. Yeah, they did. We had masks, the guys.
16 They did use them when it got real dusty.

17 Q. The contractors? Or who were -- who were
18 the guys?

19 A. Well, one was a brother-in-law. He had his
20 own business. But he would wear them. And when it
21 got dusty, we all, you know, would put them on.

22 Q. Okay. Do you have a specific recollection
23 as to whether your husband ever did that, or do you
24 know one way or the other?

25 A. I'm not sure. I -- I --

1 Q. And --

2 A. Not sure.

3 Q. -- you don't have any idea who manufactured
4 those masks that your brother-in-law wore --

5 A. No.

6 Q. -- or --

7 A. I'm sorry. I --

8 Q. -- or whoever else may have worn any type of
9 mask?

10 A. No. I don't -- I can't answer.

11 Q. You don't know who made them?

12 A. No, I don't.

13 Q. Okay. And you don't remember the details of
14 what they looked like other than they went over the
15 nose and mouth, do you?

16 A. The light white, yeah. They're -- I think
17 they're available yet today. They're generic.

18 Q. You don't know if they had one strap or two
19 straps or --

20 A. No, I don't.

21 Q. -- three straps?

22 A. No.

23 Q. Okay. And you don't know the color of the
24 straps?

25 A. No.

1 Q. You don't know the color of the box?
 2 A. No, I don't. I didn't see it.
 3 Q. Okay. And this was something where you saw
 4 your brother-in-law and -- and maybe some other
 5 workers wear these masks. Was that just, like, one
 6 or two days?
 7 A. Yes. And when they sprayed the wall with
 8 a --
 9 Q. Paint?
 10 A. Well, or a coating.
 11 Q. A primer?
 12 A. On the sheetrock when they did -- my
 13 brother-in-law did wear a face mask, but we all would
 14 move out. We wouldn't stay in the house.
 15 Q. Okay. So your husband was away from the
 16 house when that occurred?
 17 A. Right. We were gone.
 18 Q. Okay. You indicated that your husband
 19 didn't smoke. But did he -- did he ever dip or chew
 20 tobacco?
 21 A. Never.
 22 Q. Do you know if his parents smoked?
 23 A. His dad did.
 24 Q. For the whole time that you knew his dad, he
 25 smoked?

1 A. The last ten years, he -- he stopped. But
 2 he was a -- he was a -- his dad smoked heavily. He
 3 was a heavy smoker.
 4 Q. You indicated that you spoke to Frank
 5 Parker. That was one of the expert reports. You saw
 6 his name.
 7 A. Okay.
 8 Q. Have you spoken to any other individuals who
 9 are experts in this case?
 10 A. No. I don't -- no.
 11 Q. Have you spoken to a James Johnson?
 12 A. No. I don't -- no.
 13 Q. Do you recall what you spoke to Frank Parker
 14 about?
 15 A. Not -- just -- no. General. I mean --
 16 Q. Do you recall any of the specifics?
 17 A. Just questions. He had -- it was a short --
 18 it was a short phone call.
 19 Q. He just had a couple of questions about your
 20 husband?
 21 A. I can't -- I honestly can't tell you what
 22 they were. I -- sorry. I've had -- there's been a
 23 lot of stuff going on. I'm sorry.
 24 MR. BROWN: All right. Thank you,
 25 ma'am.

1 THE WITNESS: Oh. You're welcome.
 2 MR. MCGUFFEY: Bob, I've got a few
 3 quick questions, if you --
 4 MR. MCCOY: Sure. Go ahead.
 5 MR. MCGUFFEY: All right.
 6 EXAMINATION BY MR. MCGUFFEY:
 7 Q. Mr. Pecher's dad - I don't think I asked
 8 you - what -- did he have any health issues? Any
 9 history with cancer?
 10 A. No, he did not have cancer.
 11 Q. Any other health issues?
 12 A. He's an alcoholic. That's a health issue.
 13 Q. Do you know what the cause of death for him
 14 was?
 15 A. Kidney failure. I believe that was his
 16 last -- but he was deteriorating. He had lost both
 17 his legs.
 18 Q. To -- to go back to the home really quickly,
 19 when you ripped out the walls, was there insulation
 20 in the walls?
 21 A. There was newspaper in it. That's all they
 22 had. When we bought the home, it was supposedly
 23 insulated. It was newspaper.
 24 Q. And so you go to the autopsy report. Who --
 25 did you pay for it, or did someone else pay -- pay

1 for the report?
 2 A. The report?
 3 Q. Sure. The -- the --
 4 A. The --
 5 Q. The autopsy.
 6 A. I don't -- I didn't pay for anything yet.
 7 Q. Do you know who did?
 8 A. No, I don't.
 9 Q. And at the time that Mr. Pecher died, were
 10 you -- did you already have legal representation or
 11 not yet?
 12 A. He still signed his -- his admission papers,
 13 if that's what you mean.
 14 Q. No. Did you have an attorney?
 15 A. Yes, we do. We had one. We had -- through
 16 our will, but not at that point yet.
 17 Q. Not for --
 18 A. Not for this --
 19 Q. -- claims?
 20 A. No.
 21 Q. Right.
 22 A. Nothing. We didn't.
 23 MR. MCGUFFEY: I don't have anything
 24 further.
 25 MR. MCCOY: Okay. Then I think we're

1 all set.
2 THE VIDEOGRAPHER: We are off the
3 record. End of deposition. The time is 11:48. DVD
4 2 of 2.

5 (Proceedings concluded at 11:48 a.m.)

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1 STATE OF WISCONSIN)
2 WOOD COUNTY)

3 CERTIFICATION PAGE

4
5 I, MONICA M. HUNKINS, RPR, Notary
6 Public in and for the State of Wisconsin, do hereby
7 certify:

8 That prior to being examined, the
9 deponent named in the foregoing deposition, JANET
10 PECHER, was by me duly sworn to testify the truth,
11 the whole truth, and nothing but the truth. Said
12 deponent did not request the opportunity to read and
13 sign the transcript.

14 That said deposition was taken before
15 me at the time, date, and place set forth; and I
16 hereby certify the foregoing is a full, true, and
17 correct transcript of my shorthand notes so taken and
18 thereafter reduced to computerized transcription
19 under my direction and supervision.

20 I further certify that I am neither
21 counsel for nor related to any party to said action,
22 nor in any way interested in the outcome thereof; and
23 that I have no contract with the parties, attorneys,
24 or persons with an interest in the action that
25 affects or has a substantial tendency to affect
impartiality, or that requires me to provide any
service not made available to all parties to the
action.

IN WITNESS WHEREOF, I have hereunto
subscribed my name this 12th day of July, 2015.

Monica M. Hunkins, RPR
Notary Public - State of Wisconsin

My Commission Expires July 19, 2015

(800) 899-7222

appointment	71:19	63:6, 14	64:11, 19	black	11:1	18	29:6	56:5	71:18
73:20		71:21	99:2	102:21	black-and-white	22:14	72:2	74:10, 18	78:2, 3
approach	105:24	107:1, 3, 4	108:17, 24	bloated	72:25		115:9, 10		
approximate	33:18	110:13	115:18	bloating	72:11	75:18	caption	18:24	
approximately	9:19	background	7:21	25:	block	27:4	32:25	car	14:11
13:15	20:24	bad	23:2, 3		34:9			43:15	49:21,
74:14, 20	109:20	B-A-E-I-S-O	56:6		blocking	72:11		23, 25	50:25
April	60:2, 4	bagged	102:20		blocks	13:16	27:4	51:10	
area	17:4, 15	bank	28:16		33:11	82:22	83:4	97:20, 22	
36:13	46:21, 24	bankruptcy	98:17		Blodgett	82:21		care	12:7
20		base	35:15, 16	36:1	Bob	5:21	115:2	57:18	106:24
areas	36:23	37:6			bone	67:5, 7, 20		Carpenters	43:10
Army	10:3	based	13:9, 24		bones	67:16		Carrie	28:24
asbestos	16:13	basement	17:7, 11, 24,		born	7:21, 22, 23	8:4	29:25	
54:6	57:4	825	53:22		19:18	28:14	30:7,	30:12	
93:4	102:4, 7	103:2			115, 16, 17	32:8	35:23	C-A-R-R-I-E	28:24
asbestos-related	98:10	basic	36:16, 18	37:1	bought	115:22		carry	110:17
Ashland	2:5	basis	102:6		box	41:7	113:1	cars	52:10, 11
aside	20:17	basket	25:8		Boy	83:14	86:8	108:17,	
asked	51:15	bathroom	17:21		BOYER	1:1	5:8	92:2,	
asking	24:23	batteries	109:1		19, 22			Cascino	2:4
86:14	91:4	Bay	36:7		Brake	49:24	108:20	CASE	1:4, 5, 6, 7, 8, 9,
asleep	68:5	beard	104:16		brakes	51:3		10, 11	7:1
assist	90:10	becoming	70:23		branch	10:1		89:25	114:9
assisted	100:19	bedroom	17:21		break	64:5	99:21	case	5:10
assume	33:18	bef	101:23		breakfast	96:23		case-specific	94:3
45:20	75:2	beginning	5:19	103:2	breast	25:14	28:1, 5	CAT	60:6
assuming	40:1	104:3			breathing	55:7	98:7	62:4, 8, 16	
Aster	100:19	begins	71:9		bri	93:20		69:14	
asthma	55:16, 17	BEHALF	2:3, 5, 9, 16		BRIAN	2:8	6:3	catch	60:25
ate	22:3	5:15, 25	98:16, 16		brief	76:12	108:15	Catholic	82:19
Athens	19:23, 24	relief	102:6		briefly	22:15	45:1	cause	67:15
19	39:24	believe	24:12	31:24	101:15			115:13	
A-T-H-E-N-S	20:1	46:13, 21	52:20	54:	bring	13:1	37:16	caused	67:18
atmosphere	16:12	56:6	60:1	64:14	72:71, 11, 16, 18, 20			cell	58:25
Attached	51:7	82:21	87:21	92:18	bringing	18:25		59:2, 3	67:1
attack	71:21	93:3	102:3	103:25	brother	27:13	96:8	97:68:15	74:16
attend	82:16	115:15			brother-in-law	106:10		cells	61:1
attention	10:8	bell	94:11		111:19	112:4	113:4	Center	100:17
Attorney	2:24	bells	40:25		brother-in-law's	106:11		Central	1:19
116:14		bench	47:15	48:17	brought	12:9	13:6	Centre	2:14
attorneys	24:16	best	9:2	15:18	18:122:10, 21	104:13		certain	79:4
attributed	58:18	39:12	46:7	48:20	BROWN	2:16	3:6	certainly	24:2
August	35:22	98:14	109:13		23	99:11, 17, 18	105:20	CERTIFICATION	118:3
autopsy	23:20	bet	85:8		114:24			certify	118:5, 10, 12
78:7, 14, 17, 21	105:9,	better	48:14	75:13	Bseiso	56:6	59:12, 14	challenged	65:7
23	106:7, 19	2281:23	83:9		62:25	66:16	68:21	challenging	64:15
108:9, 12	115:24	beyond	101:19, 25		build	61:15		change	20:18
available	8:9	bicycled	52:8		built	51:23, 23		50:3	22:8
112:17	118:15	bid	48:10		business	82:7	111:20	76:18	
Avenue	1:19	big	22:8	36:3, 4, 5	buy	4:4	8:15	changed	17:14
8:21	29:23	48:19	50:12	61:14, 14	< C >			20 109:3	63:8
aware	15:1	84:17	101:18	102:1	Caliche	94:19		changes	21:5
71:4, 4	87:14, 17	bigger	73:24	109:19	call	47:15	69:4	82:14	
101:18	104:3	Bill	106:12	107:8	114:18			changing	21:11
		billing	31:20		called	8:5, 6	9:21	49:25	
< B >		bins	102:9, 14		15 36:3, 6	44:9	54:6	check	62:18
baby	35:23	biopsy	67:18	74:15,	25:57:24	102:9		checking	24:6
back	7:20	bit	13:2	21:14	33:17	49:10	61:8	checks	54:7
10:13	15:3	33:17	49:10	61:8	call	3:7	105:14	57:25	
25:2	27:9	78:24	91:2	104:22	camp	36:23		64:2	65:25
35:21	50:1	bike	75:22		cancer	23:15, 25	24:4	68:25	
59:25	60:11				25:13, 14	28:2, 4, 5, 5,		check-ups	56:21, 24
								62:21	63:12, 22, 23
								99:66:1	68:23
								100:7	69:6
								cheese	70:4
								chemo	59:18, 21
								14, 16	60:7,
								61:21	62:4
								13	70:6,
								76:22	
								chemotherapy	74:22
								chest	54:9
								104:21	105:6
								Chestnut	100:19

chew	113:19		complaints	14:23	15:2	cross	33:17	detail	47:15, 17	48:3, 17				
Chicago	2:5, 9	28:24	6	16:12	15:2	current	107:6		49:2					
children	28:9, 17	29:23	complex	35:17		currently	106:16	details	41:15	107:21				
68:4	100:6		computerized	50:2		customized	110:12		112:13					
Christmas	100:9		118:11			cut	44:8	47:18	81:2	deteriorate	76:21			
chronic	55:9	58:21	concerning	99:10	103:293:9				deteriorated	58:7				
church	82:16, 18, 19		concerns	7:2					deteriorating	115:16				
83:3, 6, 13, 16	92:20		concluded	117:5		< D >			diagnosed	20:24	23:23			
93:5			conditioning	48:21		dad	25:9, 10	35:4	58:24	71:17				
City	2:14	107:13	confirm	34:16	87:9		113:23, 24	114:2	114:2	diagnosis	23:10, 14	59:6		
Civil	1:17	claim	connect	74:15		dad's	41:4		74:9	75:10	77:25	88:1		
	57:16		connected	14:24		daily	21:22	59:23		diarrhea	77:18			
claiming	102:14		Connie	2:21	5:14	Dallas	2:19			Dick	95:25			
claims	94:4	98:16, 19	consi	88:5		Daniel	54:19, 19			died	116:9			
22	116:19		consulted	98:9		date	48:9	64:15, 17		difference	13:23	16:2		
clean	91:20	102:8	consulting	66:25			65:2, 7	76:24	82:1	different	20:16	27:14		
cleaned	12:9, 22	102:2	contact	106:5			85:22	118:9			36:23	37:8	64:21	68:22
cleaner	16:1		contacted	106:24	107:10	dated	3:16, 17			difficult	23:7	88:13		
clear	42:25	53:21		108:4, 8		dates	64:21	70:5, 5, 9		diffuse	68:9			
55:11	79:8	101:17	containers	46:14		dau	73:1			dinner	21:16	88:23		
Clem	26:12		continue	54:15	65:16	daughter	30:12	35:18	81:2	lip	113:19			
Clemens	26:2		contract	118:13		22				direction	14:3	81:7		
clinic	24:6	29:14	contracted	110:2		day	1:19	13:20	23:1, 12:11					
	56:14, 16	62:22, 23	contractors	111:17		3, 4	43:12	55:12	58:19	80:5, 13				
	65:24	66:2	71:20				70:25, 25	75:5, 23		disabled	87:25			
close	13:16	26:25	convi	92:1			76:21	88:10	110:21	disappear	82:1			
	33:10	34:8	51:11, 18	copies	3:19, 19	22:14	118:17			disappeared	16:8			
	82:22		copy	19:15	33:1		days	42:1, 2	59:20	discharge	75:5			
closed	83:13		85:8				91:18	113:6		discharged	9:25	75:9		
cloth	12:4		core	44:9	93:16	de	8:13			76:14				
clothes	10:11	11:21, 12:16, 18	16:19, 23	cores	102:16	dead	34:1			discomfort	67:18			
	17:14, 14	43:16	52:1	corporate	29:2	death	77:25	115:13		discussed	78:25			
16, 21, 24, 25	53:5, 8, 20, 21	92:9	12:9	correct	9:6	19:8	21:3	23:14, 16, 21	25	discussions	105:17			
clothing	12:9		38:13, 20	40:10, 11		deceased	7:2			dishes	61:5			
CNA	100:25		41:2, 3, 9, 12	43:11		Decedent	87:24			Disinterested	21:15, 22			
coating	113:10		56:7	59:4	60:5	decided	72:2			disposal	91:5			
Coe	2:18		84:25	87:12, 13	101:17	declared	57:20			disposing	91:1			
color	10:19, 22	13:5	102:10	108:18	109:1	decreased	22:1	72:12		dissipate	81:25			
	14:11, 13	112:23	113:17	118:10	109:1	DEFENDANT	2:5, 9, 16	91:21		distance	13:8	79:15		
colors	10:24		corrected	15:15, 21, 25		definite	75:10	16:2, 11		distribute	59:20			
come	9:2	10:10	27:19:21	20:5		definitely	14:10			DISTRICT	1:1, 1	5:11,		
	59:12, 23	60:11	69:16	19:12	20:1	definitive	77:25			doc	76:1			
	76:12	103:5	79:21	55:9, 11		dehydrated	77:15, 17			doctor	55:25, 25	56:1, 5		
comes	27:12	74:6	counsel	3:20	5:18	dehydration	72:13			57:24	62:13	63:3	76:4	
coming	13:18	14:2	105:15	118:12		dementia	70:18			73:278:18				
commencing	1:19		count	60:21		depending	59:20			doctors	61:5	66:1	76:2	
Commission	118:21		County	7:23	118:1	deponent	118:6, 8			108:8				
communicating	108:2		couple	19:11	21:1	DEPOSITION	1:13, 14			doctor's	65:24			
communications	105:14		22:10	24:3	58:11, 12	2:24	3:12	5:3, 7, 12		document	69:10	71:16		
community	34:7	78:24	64:6	114:19		6:25	7:10, 14, 18	18:13		85:1, 25	90:2			
	81:23	91:13	course	10:7, 18	13:25	37:25	65:20	71:12		blowing	10:13	11:20		
commute	43:12		48:13			89:20	93:24	117:3		18:13	45:2	48:16		
comp	57:15	98:22	COURT	1:1	5:11, 16	118:6, 9				49:19	54:13	74:15		
COMPANY	1:1, 4, 5, 6, 7, 8, 9, 10	2:12, 16	5:2	6:5, 7	7:11	59:1	depressed	89:5		88:20	91:23	92:4		
24	6:1	24:21	coveralls	52:23		descri	84:17			111:13				
compare	13:5		covered	10:14	101:6,	describe	13:11			Donald	58:2			
Compared	79:3, 3		covers	24:13		described	75:7			donated	93:14			
Complained	42:12	58:17	created	11:3		describes	73:12	75:6		door	8:24, 24	13:12		
	67:20		cremated	78:11		designated	46:17			44:8	48:1, 1	51:13		
complaining	55:6	77:19	cremation	78:12		detached	51:9, 16			93:10	101:9, 12	102:4		
										103:1				

Doors 26:13 44:7, 20	emotional 21:10	far 13:11 27:3	forgetting 71:3, 5
47:7, 10 102:16, 16	emotionally 23:9	67:16 72:23 80:21	forgot 61:5
Dorchester 19:19 27:2	employees 53:6	83:2 104:23 108:11	form 92:23
32:13 40:3	employment 38:11	farm 7:24 25:7, 9	Forman 2:13
downhill 74:21	100:5, 12 101:5	farmers 25:8	Fort 36:24, 25 37:1, 4
downstairs 17:10	ended 88:20	fast 74:21	87:15, 16 forth 118:9
110:24 111:1	enjoy 48:25	father 95:19 96:2	forwarding 35:10
downtown 58:2	enjoyed 71:2	favorite 22:9	
Dr 54:19, 21 56:1, 3	entire 53:13	Federal 1:16	found 23:24 46:23
13, 14 59:14 62:25	environment 15:3	feeding 44:19	74:5 78:5
66:16 68:21 73:6	especially 48:22	feel 39:8 69:3	four 13:16 25:18 59:19
7, 10 77:6, 7, 8 78:18	establish 38:10	feeling 22:24 23:6	89:18
94:7, 9	estimate 15:18 109:13	67:24 75:13	four-by-eight 111:4
Drive 2:9	ET 1:1, 4, 5, 6, 7, 8, 9, 10	feet 58:18	four-foot 111:3
driver 45:21 46:8	48:2	fi 83:3	fourth 39:18 91:15
driving 48:5 84:1, 7	eventually 82:2	Figi's 100:7	frame 64:25
98:2 102:1	everybody 60:22	figured 24:10	Frank 3:16 94:8, 24
dro 36:1	Everyday 88:24	filed 2:24 5:10	114:4, 13
drove 36:2 84:15	exact 9:1 33:19	files 3:20 38:12	free 39:9
101:18	48:9 54:17 81:24	filled 2:1 86:10	fresh 79:8 92:11
dryer 45:1 92:7, 9	exactly 26:1 46:25	film 10:15 11:3	Friday 77:2
drying 45:2	49:9 70:22 75:1	film 18:10	friend 106:25
Duane 27:13	examination 1:14 3:3	filter 10:18, 25 12:20	friends 96:13
D-U-A-N-E 27:13	6, 7 6:17 24:19	final 19:6	front 19:15 39:21 64:7
duly 6:16 118:7	115:6	find 24:7 94:23	78:7
dump 46:17, 18 84:17	examined 6:16 118:6	fine 14:9 27:15	full 7:6 19 53:11 73:2, 3
102:21	Excuse 35:8	finish 18:9	118:10
dust 10:6, 10, 15, 19, 24	Exh 3:11, 11, 12, 13, 14, 14, 15, 15, 16, 17	finished 42:5 94:14	full-time 46:8
11:2, 2, 19 12:14, 22	Exhibit 5:3 7:9, 14, 15	finishes 31:3	function 23:8
13:17, 24 14:6 15:8	15 18:17, 19, 22 31:24	firm 17:24	funeral 78:16
16:7, 20 42:14 43:15	137:25 65:20 71:12	firm 19:5 20:5, 6	funther 116:24 118:12
79:10, 25 80:24 81:13	72:4 84:19 85:4	90:11 105:18 107:11	
19, 23 83:6 91:16, 19	1039:24	first 6:15 7:19	< G >
20 92:19 97:19	exhibits 3:17, 20 22:13	17:25 18:4, 14 21:5	Garage 51:6, 10, 13, 20
dusty 42:13 47:11	expert 94:4 114:5	22:17 35:22 38:15	52:5, 10
103:3, 5, 7 111:16, 21	experts 89:25 114:9	39:18 41:24 60:5	gas 73:4, 23
duties 101:20	Expires 118:21	85:24 86:7 90:10	gather 12:25
DVD 64:9, 12 117:3	explain 56:18	91:15 107:14 109:19	gatherings 88:12 89:2
	explained 72:25	fishing 22:5 68:2	gears 49:10 78:23
< E >	exposed 87:18 92:19	7	general 68:2 114:15
earlier 37:19 52:12	93:4 105:5	five 26:9 30:1, 4	generally 52:5, 10 55:24
72:16 81:22 84:24	Exposure 3:15 78:24	11 59:19 83:4	336:6 79:5 80:20 81:5
earliest 22:17	87:11 89:24	five-minute 64:5	generic 112:17
early 23:8 53:14	extent 105:14	fixed 16:7	getting 16:21 67:10, 21
easier 39:5 75:3	extra 46:2 48:5, 5	fixing 88:23	73:24 74:8
easily 60:25	93:23	flat 58:18	give 6:19 32:20 48:8
East 30:21 40:18		flip 39:16 40:17	58:22 71:16 76:24
easygoing 88:18		Floor 2:19 17:20, 25, 2599:1	81:24 85:21 90:5, 7
eat 21:13 22:2	< F >	18:5 54:2	109:12
Edgar 26:1	face 113:13	flopped 61:8	given 89:25
effect 70:24	facial 104:17	flowers 49:18	gives 39:18 41:10
eight 29:25 59:8	122 102:15	fluctuated 61:15	glance 90:7
83:4 109:14	factory 25:9	fluid 75:23	glass 44:9
either 25:12 48:17, 17	Fagbemi 76:6 77:6	flying 48:23	glue 44:20 45:2
55:10 94:5 102:22	failure 115:15	fold 12:6	Go 7:22 18:17 20:16
104:11	fall 26:5 68:4	following 35:21	24:18 25:2 32:2 36:10,
elaborate 88:9	familiar 35:7 42:9	follows 6:16	22 37:8, 8, 10, 24 38:21
Electronic 3:20	44:10, 23 54:20 77:3	foot 101:12	39:2, 9, 16 54:4 56:17,
eliminated 48:9	family 28:3 43:22	foregoing 118:6, 10	20 58:21 59:25 60:10,
eliminations 48:10	55:24 56:1 65:11	Forever 56:19	13 62:18, 21 63:12
emergency 71:22	74:7 106:2, 3, 6, 9	forgetful 70:23	64:19 66:13 68:3
Emil 96:2	fans 48:20, 21		82:24 85:10 86:3
			88:13, 18, 25 89:1

92:25	96:24	99:2	hazards	103:2	80:15	83:4	100:1	intense	59:21
105:16, 18	115:4, 18, 24	24	head	25:4	110:23	113:14, 16		interest	68:1 118:14
goes	62:4		health	21:5 103:11	housing	8:9		interested	45:8 118:13
going	7:20 14:18	21:5, 8, 11, 12	healthy	25:11 27:15	Huh	88:16 98:4		Interrogatories	3:13
24:23 25:2 27:9		28:1, 16 29:3, 14	heard	95:17	hung	13:4, 19 91:22		18:24	
31:5, 22 37:15, 24			hearing	57:8, 12, 25				interrogatory	31:23
41:13, 15 54:4 55:2			6 58:1, 2, 3, 7 93:15, 15		Hunkins	1:18 5:17		84:20 85:6 87:5, 7	
59:10, 11, 11 60:16			heavier	14:1	118:3, 17			intersection	33:24
61:21 63:14 64:5, 6			heavily	114:2	Huron	28:25, 25		introducing	6:18
65:16, 16, 23 66:12, 13			heavy	114:3	husband	7:2 8:1, 12, 20:19 61:14 93:4		invasion	36:7
71:8 78:23 87:5			HECKEL	1:4 96:18, 20	96:24 101:13 102:1			involve	105:17
89:23 90:7 94:12			97:1		103:14, 20 104:13			involved	108:1
95:13, 14, 14 99:9			He'd	21:13, 13 36:22	16, 19 108:16 109:23			issue	16:11 115:12
114:23			58:21 59:19, 23, 23, 25		110:5, 9, 15 111:12, 23			issues	98:6 115:8, 11
good	76:24 79:7		60:6, 6, 9, 10 69:17		113:15, 18 114:20			It'd	76:21
gosh	52:3		88:22 93:20 103:5		husband's	101:16		< J >	
grab	32:2 64:6		Heiting	106:12, 14, 18	hydrate	77:16		Jackson	2:15
gradual	76:19 88:8		107:9, 17, 22		< I >			JACOBS	1:10
gradually	81:25		H-E-I-T-I-N-G	106:12	idea	55:3 112:3		James	114:11
graduation	22:23		held	5:12	identification	5:4 7:15		JANET	1:13, 14 2:24
Gramann	5:15, 17		he'll	26:8, 12	18:20 38:1 65:21			3:3, 12 5:7 6:15, 21	
grandchildren	89:17		Help	49:18 88:22	170:73 89:21 93:25			87:10 118:6	
granddaughter's	22:23, 25 73:1		helped	110:17	IL	2:5, 9		Jessica	76:10
grandkids	68:4 89:14		helping	49:20 75:16	Illness	66:19, 24 68:8		Job	3:14 8:1 31:19
Great	34:24 51:25		Henry	3:17 94:10	72:5 98:10			41:16 42:13 47:11	
greatgrands	89:19		Herald	82:12	illnesses	98:24		48:10, 11, 25 106:13	
grew	7:24		hereunto	118:16	immediately	71:22		jobs	27:14 39:17 44:7
Ground	17:20		Highway	34:8 84:8	immune	60:23		John's	82:19 92:20
grow	29:22 49:18		hip	58:14	impact	97:24		Johnson	114:11
Guard	101:16		hire	65:2	impacts	98:4		Joiners	43:10
Guards	8:6 10:3		hired	64:18	impartiality	118:15		joints	67:16
guess	32:20 62:1		History	3:14 25:13	important	58:12		Joseph's	63:5, 6
guided	44:2		28:4, 18 29:6 54:23		improve	75:11		July	8:18 9:16 23:1
guys	111:15, 18		55:22, 22 65:17 66:10		improvement	75:9		35:21, 22 71:9, 10, 11	
< H >			24 67:4 72:5 83:1		inclined	109:3		73:10 74:6 76:14, 14	
hair	104:17		115:9		included	3:17, 19		77:20 118:17, 21	
half	9:19 27:4 45:12 72:12 73:14		Holiday	1:19	including	60:22		June	1:19 5:6 22:22
hall	17:22		hollow	44:9	increased	72:12 75:19		66:13 67:22 68:22	
hallway	17:18 18:4		home	8:11, 15 10:10	indicate	102:25 110:4		69:1, 14, 21 73:6, 10	
hamper	11:18 17:15, 16 17:13 36:15 39:25		12:5, 9 13:6 16:18		indicated	102:3 105:8		< K >	
17 18:7 53:25 54:1 50:5, 10, 13, 13, 14, 15, 20			16:7:13 36:15 39:25		106:19 108:16, 19			Kaiser	58:2
hand	6:8 38:2 47:152:4 53:8 59:23		75:13 76:25 78:16		109:5 113:18 114:4			keep	48:13 62:13 63:23
handed	48:18 65:23 89:23		80:21 81:12 83:9, 11		individuals	114:8		KEVIN	2:16 5:23
handle	94:3		84:1, 7, 11 93:12, 16, 18		indoor	51:6		99:18	
handled	16:20, 21 107:23		20 97:19 100:13		information	19:4 34:9		Kidney	115:15
hang	10:12		9 104:14 109:6, 9, 24		103:16 105:16			kids	50:13 60:23 68:3
hanging	12:15, 16, 17		115:18, 22		information,	87:10		kind	15:8 16:4 28:13
Hansen	2:21 5:14		honestly	93:6 114:21	inherited	89:18		39:17 41:13 49:21	
happened	63:9 69:16		Horvath	54:21	Inn	1:19		50:5, 20 54:4 58:21	
72:18 76:20			hospital	24:6 63:1, 2, 4, 52:10	inside	14:18 17:5		60:12 65:16 70:9	
hard	21:24 23:6		78:2 71:25 74:9 75:1		insp	48:1		71:15 73:18 106:13	
harder	22:7 89:2		76:2 78:14		inspected	47:10		108:24 109:8	
Hardin	2:8		hospitalized	59:18	inspecting	47:7		knew	15:4 24:2 77:13
hardy	22:3		hotel	23:8	inspector	48:1		78:2, 3 95:20, 23, 23	
haul	46:16 102:20		hour	83:11	install	110:7		96:9, 11, 15, 25 97:5, 12, 15, 17 113:24	
hauled	46:11 47:1		Hours	78:9, 12	instance	1:16		know	8:25 9:7, 11 13:9, 9 14:17, 24 15:7 16:13, 14 22:2 24:8 25:1, 11, 12 26:15, 18, 19 27:5, 19 33:17, 19, 23 34:4, 5
102:3			house	10:18 14:16	insulated	115:23			
hauler	45:20		23 32:25 36:15		insulation	115:19			

35:24	36:1, 2, 5, 14	left	36:13, 15	37:13	lose	61:3	mask	104:14	112:9
40:3	41:1, 5, 14, 20		49:13, 13	50:13	losing	68:1		113:13	
42:12	43:2, 4, 5, 17, 18,		111:11		loss	57:9	masks	103:21	104:1, 4
20	44:5, 16, 17	45:3	legal	116:10	lost	115:16		111:13, 15	112:4
18	46:11, 15, 18, 24		legs	115:17	lot	16:6	68:5	73:1	113:5
	47:1, 2, 11, 13, 13, 25		Leroy	96:4		88:18	93:20	101:7	match
	48:14, 19, 23	49:1, 4, 7	lethargic	21:12	60:20	114:23			materials
	50:22	51:3	52:15	15	67:25				matters
	53:1, 4, 15	54:1, 11, 18	lethargy	72:13		lots	80:13		MCCOY
	55:23	57:17, 17, 24	Letter	3:16, 17		loved	22:5, 5, 6	89:13	20, 25
	58:16, 23	59:8, 21	Lewis	36:25	37:1, 4	lumber	93:13		4:1
	63:14, 19	64:16, 24		87:15, 15, 16		lymph	68:13, 14, 15, 16,		5:21, 21
	65:5, 6, 12, 13	66:10	life	70:25	106:15	18			6:11, 14, 17
	68:1, 19	70:20	lift	45:4		lymphoma	58:25	59:3	7:8, 12, 16
	73:8	76:1, 7	light	18:4	10:22	16	67:1		18:21
	79:8	80:9, 12, 13, 14		14:13	112:16	L-Y-M-P-H-O-M-A	59:3		24:12, 16, 18
	81:10, 14, 15, 16, 18, 19,		lights	44:8		< M >			31:2, 5, 13, 25
20	82:8	83:2, 11	LINE	3:20	15:13	ma	58:25	59:3	38:7, 9,
14, 16	85:20	86:8, 9		72:4	73:13	Ma'am	6:7	61:7	39:1, 4, 7, 11,
	87:19	88:5, 14, 24	lines	49:24		100:3	114:25		14
6	90:13, 25	91:4, 7, 11	list	66:20		machine	11:23	12:1	43:1, 4
	92:14	93:7, 8	listed	5:10	32:24	33:6	22	44:22	52:13
24	95:1, 3, 16, 17	96:9, 39:17		9:39:17	40:18	maiden	35:2		78:25
16	97:2, 2, 3, 6, 9, 15		listless	68:1	88:14	mail	35:6, 12		79:3, 6, 15, 19
	98:1	101:17, 24	lists	70:1, 4		mailbox	35:13		86:1, 3,
2, 12, 14	104:1, 11, 12		little	13:2	14:4	mailing	41:8		14, 17
	106:1, 13	107:1, 13		23:5	25:5, 19	Main	34:6		89:24
	108:10, 12	109:2	110:47:18	49:10	57:2	major	22:6		90:11
17	111:21, 24	112:11	11, 69:17, 20	73:7	78:2	making	98:19		92:21, 23
18, 23	113:1, 22	115:13	91:2	104:22		Mali	77:10		94:13
	116:7		live	6:22	17:24	MA-L-I	77:12		95:1, 7
knowledge	12:7, 13		27:3	28:14	30:20	managed	88:21		98:15
16:5	27:7	39:14	42:43	106:16		mantle	58:25	59:2	99:8, 13
52:19	98:14	101:1	lived	8:11	25:9, 10	68:14, 15	74:16		105:13
102:18, 22	103:13, 16,		30:4	31:1	32:18	MA-N-T-L-E	59:3		99118:4
17	108:5, 7		35:6, 10, 15	40:13, 20		manufactured	112:3		116:25
knows	95:1		79:1, 22	80:7	83:20	Maple	33:1, 5, 22	40:8	MCGUFFEY
Koepke	97:16		84:5	90:20		24	41:2	83:21	2:13, 25
Krutz	2:13		lives	26:1, 12, 25	27:1	Marathon	7:23		23:6, 7
< L >			24	28:15, 24	29:13	mark	7:9	18:17	5:25, 25
lack	73:5, 22		living	21:22	25:23	29:25	37:24	65:19	24:19,
Lamar	2:14		30:23	42:20	58:23	66:5, 6	71:8	89:12	21
lasted	60:1		68:2	100:19		MARKED	3:10	5:3	31:9, 15
Late	9:14	19:9, 9	LLP	2:8, 13		7:14, 17	18:19	22:1	32:1
109:20			local	16:3, 9	29:14	31:23	37:25	65:20	38:2,
laun	18:7		82:10	107:9		71:12	89:20	93:24	4, 8, 22
laundry	10:12	11:11	locally	30:17		married	8:2	9:15	6
12:4, 23	13:5, 19		located	82:20		28:17	31:1	32:17	56:11, 12
21	18:13	53:16	location	49:6	80:25	40:14	42:3	55:1	59:2, 5
Law	2:4	19:4	lockers	52:18		marrow	67:5, 8		61:13
89:25	105:17	106:4	logistics	107:22		Marshall	76:10		45:20
107:8, 11, 14, 18, 23			long	45:7	46:3, 4	Marshfield	1:19	5:13	105:5
108:3			85:6	91:25	92:1	92:22	8:3, 10, 16, 21, 23		52:2
			20	110:19		13:14	26:13, 13, 24		measuring
lawn	88:22		longer	50:4	69:23	29:13	30:15, 20, 21		13:10
lawyers	107:6	108:9	look	38:5	39:7, 16	31:17	32:19	33:6	109:3
leading	73:20		44:18	45:9	66:3, 17, 140:19	40:19	46:22	56:16	Med
learned	103:9		69:9, 24, 24	72:4	80:262:23	262:23	65:24	66:2	101:2
leave	76:13		91:12			79:11, 17	80:1, 6		Medford
Leer	56:1, 13		looked	13:7	84:15	19, 20	83:23	87:11	28:1
L-E-E-R	56:2		112:14			99:24	100:13, 17		Media
			looking	38:18	85:1	MASEPHOL	1:5	95:1	5:7
						96:2			16:16
									Medical
									3:14, 15
									54:7
									65:17
									66:15, 20
									71:10
									76:15
									108:11
									64:1
									Medicare
									58:22
									59:22
									61:20
									61:15
									101:2
									35:20
									96:15
									83:19, 19
									43:7
									106:2, 3,
									6, 9
									44:14
									69:20
									82:127:8
									103:3
									37:18
									47:23
									48:19
									50:25
									mesothelioma
									20:24
									23:11

met 8:1, 13 9:13, 14 32:15, 16 36:18, 21 37:11 54:19, 25 94:5 5:6, 9 101:24
 metastasized 67:7
 middle 20:4 26:6, 9
 mike 6:13
 miles 32:21 79:16
 military 36:16
 Milton 95:16
 Milwaukee 5:16
 Mine 51:15
 mineral 93:16
 Ministry 63:5, 5
 minor 57:2
 minute 37:16
 missed 61:4
 Mississippi 2:15
 mistake 20:6
 MITCH 2:13, 25 5:2
 24:20
 moment 20:19 42:2
 money 48:6 98:21
 Monica 1:18 5:17
 118:3, 17
 monitoring 57:6
 month 85:23
 monthly 83:19
 months 21:2 24:3
 40:21 60:6, 15 62:5
 63:15 67:19 69:13, 22 78:8
 morning 21:13
 mother 25:8, 9, 14
 mouth 112:15
 move 9:17 47:25
 66:21 113:14
 moved 7:25 8:3, 8
 10:4, 7 15:20 29:24
 32:15, 17 34:3, 10
 47:14 80:3 84:9
 99:24 100:13 109:1
 moving 8:10 45:1

 < N >
 name 5:14 6:19, 20
 18:25 20:3, 4 24:20
 35:2 41:4 43:9
 82:10 94:10, 15, 21
 95:17 97:17 99:18
 106:11 114:6 118:1
 named 78:18 118:6
 names 55:23 63:8
 97:18
 National 8:6 10:3
 101:16
 natural 89:18
 nature 29:9
 near 33:12, 23 46:21
 80:10, 10 81:17 83:1
 nearby 90:21
 need 39:7 69:4
 99:21
 needed 20:12 57:2
 58:20 75:14
 negative 74:19
 neither 118:12
 nervous 55:11
 never 24:8 27:17
 13 43:24 53:7 58:11
 22 60:11 61:4, 15
 63:21 77:13 78:5
 84:12, 16, 17 95:5, 6, 9
 96:16 101:9, 10 103:11
 104:13, 15, 24 113:21
 new 31:19 35:23
 106:15 109:2, 10
 News 82:12
 newspaper 82:11
 115:21, 23
 night 19:9 77:2
 11, 16
 nodes 68:13, 14, 15, 16, 18
 nods 25:4
 noise 57:10, 23
 normal 52:24 68:23
 69:6
 normally 88:11, 22
 North 2:19 6:23
 10:4 34:10 41:10
 30:30 80:3
 northeast 91:2
 Nos 5:3 93:24
 nose 112:15
 Notary 1:18 118:3, 2
 note 66:7
 noted 53:15
 notes 65:24 118:10
 Notice 1:17 3:12
 9:21 21:5
 noticeable 14:10 68:20
 noticed 10:9 22:8
 November 35:21
 number 34:17 41:7
 48:14 91:5
 nurse 57:1 63:22, 23
 100:22
 nursing 71:22 100:16, 114:7 116:25
 2017 101:1
 76:11
 < O >
 object 92:21 105:13
 Observation 70:1, 10
 observe 10:5 14:16
 21:10 79:10, 25 83:6
 observed 14:6
 obviously 92:24 99:1
 occupation 106:13
 occurred 23:10 104:8
 113:16
 O'CONNOR 2:8
 October 35:20 60:2
 odor 91:21
 offender 45:1
 offered 53:5
 office 31:18 41:7
 98:15 106:25 107:8
 Officer 28:16
 Offices 2:4 5:16
 off-white 10:21 11:9, 36:4, 114
 on, 31:4 50:7 52:1
 56:16 57:5 58:10
 78:2 79:12 85:9
 92:10 115:1
 on 50:3 109:1
 O-J 56:3
 OJSA-Y 56:4
 Okay 6:11, 21 7:8, 12, 23 8:19 9:4, 10, 15, 24 10:23 11:25
 12, 19 15:11, 16 16:15
 86:47:8, 17 18:9, 22
 9, 11, 11, 17, 25 20:9, 14, 16, 22 21:1 22:13
 23:17, 22 24:2, 15, 22, 25 25:3 26:7, 11
 11, 13, 20 28:23 29:12
 20 30:5, 10, 14 31:7, 32:19, 24 33:8, 15
 34:12 35:5 36:20
 8:27:15, 22 38:21 39:20, 21
 19 40:6, 15 42:10
 45:13 47:6 48:7
 51:17, 22 52:3 54:3
 56:10 57:7 58:24
 10 62:20 63:11
 22, 23 65:10, 15, 18
 66:22 69:11, 19 70:3, 113:9
 16 72:6 73:17 76:21
 78:10 79:6, 13, 19, 24
 5:20:20, 22 85:9 86:1
 17, 23 87:1, 8, 23 89:10
 20 90:1, 6, 9 91:12, 14
 92:16 93:22 99:11, 22, 23, 24 100:5, 24
 101:3, 5, 15 104:3
 105:4, 21 106:6 107:132:18
 108:6, 22 111:9, 22 112:13, 23 113:3, 15, 18
 114:7 116:25
 old 25:20 29:4, 15
 older 50:15 67:21
 oldest 25:24 26:3, 4
 Olympia 30:13 35:15
 on-call 76:12
 once 36:25 60:10
 6 100:13
 oncologist 66:25
 one-car 51:19
 ones 36:3 48:8
 open 102:21 111:11
 opened 10:17
 operating 42:7
 operator 42:19 44:15
 45:5 48:18
 opportunity 118:8
 opposed 69:13
 ordered 77:7
 organs 61:24
 original 2:23 3:19
 1067:14
 originals 3:17
 Oswani 56:4, 14
 O-S-W-A-N-I 56:4
 outcome 118:13
 outer 52:21
 outs 13:17
 outside 10:16 12:15, 18, 23 13:18 14:16 51:11
 17, 91:22 97:19 100:1, 13
 Overseas 36:11, 12
 over-the-counter 61:23
 OWENS-ILLINOIS 2:7
 6:4

 < P >
 PAGE 3:3, 20 19:14
 12, 20:3 32:3 34:19 39:21
 22 40:17 41:10 45:9
 66:20 69:9, 24, 25, 25
 70:2 72:4 75:8 87:3,
 94:22, 22, 24
 118:3
 paid 5 57:14 84:12
 pain 58:22 67:16 72:9,
 11 61:9, 73:12, 15 75:24
 64:37:19
 paint 26:17 110:6
 70:3, 113:9
 Palmetto 26:25
 pants 53:1
 paper 82:13
 papers 16:3, 10 116:12
 paperwork 65:3
 paragraph 91:15
 pardon 37:16
 parents 7:21 25:6
 107:132:18 36:15 39:24
 113:22
 park 51:10 52:5
 parked 14:8
 Parker 3:16 94:8, 24
 95:11 114:5, 13
 parking 80:13
 part 11:2, 3, 6 15:3
 31:18 34:19 35:22
 634:8 58:18 71:2 106:24
 participate 110:9, 15
 particles 10:15
 particular 34:17 66:2,
 108:2 101:20
 parties 1:18 118:13, 15
 parts 13:18 26:21
 party 18:25 44:4
 101:13 118:12
 pass 7:10
 passed 8:14 21:1, 7, 8
 22:4 23:14 24:4 25:22

61:19	62:17	77:2	24 50:11	progress 50:17	114:13, 16
101:2			plaintiff 5:8, 20	progressed 50:2	receive 35:5
pastime 22:9			Plaintiffs 1:16 2:3	pro session 70:21	received 98:21
Pat 27:24			95:15 99:9	projects 93:19	recess 64:10
patient 72:8			Plaintiff's 3:13 18:23	pronunciation 59:12	recognize 94:15 97:18
Patricia 27:24			Plan 69:10	protect 61:22, 23	recollection 16:10 18:12
pay 10:8 48:14			planning 99:14	protection 103:15	20:21 40:20 46:7
115:25, 25, 25 116:6			plant 8:24 13:12	provide 85:17 118:15	64:24 79:24 111:22
pdf 3:20			26:16, 22 27:18 32:3	provided 3:20 19:3	recommend 105:11
Peach 6:23 8:21			103:10 41:18 43:18	2152:16, 17 57:13	recommended 106:4, 6
11:13 13:11 17:23			45:16 47:12 49:1	PRIEST 1:7	107:18
18:14 29:23 30:23			16, 18 53:5 54:8	Public 1:18 16:5	Record 3:14, 15 5:5, 19
34:10 41:10 50:10			57:1 79:10, 11 80:12	pull 10:13	7:8 19:13 64:9, 12
80:3 84:9			9, 10, 11, 15, 25 81:1, 9, 16	purpose 36:16	117:3
Pearl 2:19			82:14, 14, 23, 25	purposes 99:14	records 9:1, 4, 6 37:19, 20 38:10, 11 42:18
PECHER 1:6, 13, 16			87:12 91:16 92:19	pursuant 1:16, 17	54:11 64:19
2:24 3:3, 12, 15 5:8			93:10 97:7 100:7	push 110:13	re-do 82:8
6:15, 21, 22 7:3 24:14			101:9, 12 102:4 103:10	put 6:12 12:23	redone 50:22 92:13
20 32:8 37:19, 21			10, 15 104:14, 17	20:17, 17 44:9 50:1	Reduced 118:11
38:10 54:23 64:14			Plaster 110:1	66:7 92:13 109:1	referring 57:4
75:8 82:16 83:14			Plaza 2:18	111:10, 21	refresh 40:19, 19
84:14 87:10 92:19			Pleasant 28:15		refuse 45:20 46:14
99:3 116:9 118:7			please 5:18 6:6		regarding 87:11
P-E-C-H-E-R 6:21			plus 52:3	< Q >	registered 100:21
Pecher's 25:6 49:11			point 9:9 12:3	quality 70:24 83:8	regular 54:7
52:13 98:16 115:7			22:2 26:18 47:14	question 18:10 31:3	related 24:5 98:22
people 35:18 97:6			13 97:14 98:8 103:8	82:6 41:24 67:3	101:9 118:12
perform 105:23			104:9 116:16	75:7 90:10 92:23	relation 82:23
performed 106:7, 20			polluting 16:13	questionable 68:24	relationship 97:13
108:12			portion 75:4	69:15, 20 questioning 38:9	relaunders 92:13
period 21:6 43:19			post 41:7	questions 24:13, 24	relieve 75:24
110:19			potential 98:10	25:2 38:25 39:2	remained 110:24
permanent 57:8			Prairie 28:15	23 90:8, 16 95:14	remember 15:24 20:23
Pers 81:20			prefer 92:10	16, 19 108:15 114:17	33:20 34:5 40:10
person 24:23 106:2			prepared 19:4 89:24	19 115:3	43:15 44:25 53:12
107:8			preparing 90:11	quick 66:16 90:16	54:14 55:6, 18 61:20
personal 15:6 34:20			PRESENT 2:21 8:16	72:15, 3	67:19 71:16 103:12
103:13 106:5			19 66:19, 24 68:8	quickly 115:18	112:13
Personally 81:13 87:1			pressure 75:25	Quinn 54:19	remission 59:17 60:2
100:2, 12 101:6			Pretty 13:21 97:25	quit 37:14 52:9	remodeled 50:14
personnel 108:12			109:4	14	remodeling 50:6 109:6, 8, 11
persons 118:14			prevent 97:19	quite 44:10, 10	remodels 50:10
Phillips 21:18			primary 24:7 55:25		Removal 110:11
phone 114:18			78:4	< R >	remove 46:15
Photograph 3:11, 11			primer 113:11	radiation 104:20, 22	removed 25:16 75:23
photos 22:16			printed 66:11	118:2, 5	111:2
physical 21:10			prior 50:21 59:6	railroad 33:25 34:2	repair 49:21, 23 50:25
physically 13:1 23:9			Probab 42:22	raise 6:8 73:5	Repeat 35:8
physician 63:19 77:4			probably 39:4 46:5	raised 19:18 25:7	repeated 110:22
98:9 108:11			109:14	rapidly 73:9	rephrase 70:8
physicians 55:24			problem 39:6 65:14	read 118:8	replace 109:2
pick 46:1			67:4	real 73:23 111:16	replaced 58:5, 6 109:16, 17 110:11 111:5, 6
picked 59:24			problems 27:6 28:21	ready 15:3 55:20	report 66:15 76:16
pictures 22:10			29:8 55:7 58:14	recall 13:21 35:11	78:7, 17 115:24 116:1, 2
pieces 93:10, 13, 16, 18			67:16 72:23 73:23	43:11 45:6 54:12	reporter 5:17 6:6, 7
pier 35:17			77:16 98:7 103:11	55:13 67:5 69:9, 12	82:11, 3 59:1 66:8
Pigs 36:7			Procedure 1:17 46:16	76:11 79:7 80:2	Reporting 5:15, 17
pills 59:23			Proceedings 117:5	83:25 84:5, 10 86:2	reports 71:10 94:4, 5
pinpointed 80:25			process 11:20 44:20	24 93:15 108:23	114:5
place 13:11 21:18			38:16 110:16, 20	109:11, 24 110:19	
70:17 79:4 118:9			produced 37:23		
places 14:5, 7, 15 41:1			Program 54:6		

represent 24:21	Rita 96:11	18 80:22 84:25	85:11 21:21 68:5
representation 116:10	RN 100:21	13 90:2 94:4	slide 61:8
representing 6:3	roads 80:6	sent 71:21 72:9	slightly 20:16
request 78:21 105:25	ROBERT 2:4 3:16, 17	sentence 72:8	slow 70:22
118:8	Roddis 26:14 38:12	separate 26:21, 23	small 34:7 69:15
requested 3:19, 20	Roger 97:4	September 100:8	smell 92:11
required 56:22	Ron 97:16	service 8:5 9:20, 22	smelled 91:16, 17
requires 118:15	room 50:23 60:24	10:1 30:13, 14 33:4	smoke 16:6 80:17
resell 97:22	71:22 74:7 91:20	30:19, 25 36:21	21113:19
residence 8:16, 19	rooms 109:18 110:23	109:4 118:15	smoked 54:25 113:22,
residue 13:2	111:1	set 64:7 69:22 71:25	114:2
resp 103:17	Rose 25:24 26:3, 4	108:2 117:1 118:9	smoker 114:3
respect 107:22	roughly 42:21 62:15	settle 14:19	smoking 54:24
respirator 104:14	75:6	seven 8:11, 15 29:25	soap 12:6, 8
respirators 103:22	Route 39:24	30:1, 6 34:13	Social 34:16, 21
104:6 111:13	router 47:17 48:18	severe 73:23 77:18	socially 96:16 97:9
respiratory 27:5 28:2	routine 68:25	shake 16:19 17:2	somebody 102:11
29:8 98:7 103:15	RPR 1:18 118:3, 17	shaking 53:19	somewhat 56:8 64:15
Response 3:13 18:23	Rule 1:16	shards 93:16	son 8:4 35:19 97:1
87:7	Rules 1:16	Sharon 96:20	sooner 69:17
responses 31:24 84:22	run 52:9	sheetrock 109:24 111:5	sorry 31:4, 14 44:17
rest 21:14 26:19	running 70:9	10 113:12	61:9 72:10 92:17
restorative 101:1	< S >	sheets 10:12 92:4	94:22 112:7 114:22, 23
restrooms 64:6	sa 103:23	she'll 31:9, 9, 10 99:15	sort 28:14 55:9, 19, 21
retention 72:24	Saint 63:5, 6	15 57:25 58:12 70:24	76:15 78:24
retired 43:22, 25 49:17	sat 23:4	Shelli 29:11 30:15, 20	sound 35:7 54:20 77:10
50:9 56:3	saw 10:20 13:4	S-H-E-L-L-I 29:11	sounds 42:9 44:10, 23
retiree's 96:23	42:8, 8, 9, 19 63:21	shift 41:24 49:10	South 1:19 2:5, 9, 14
retirement 101:13	80:19, 24 81:3 84:17	shoes 10:11 53:10, 10	32:25 33:5
returned 9:22	17 85:24 86:5, 9, 15, 25	shop 26:17 48:3, 17	space 50:14 111:11
reviewed 19:3, 5	96:24 113:3 114:5	shops 109:4	speak 64:16
rewash 10:14	sawdust 42:14	short 99:21 114:17, 18	special 60:24
rewashed 92:5	sawing 44:23	shorthand 118:10	specific 48:24 80:25
reworked 50:20	says 19:18 67:4	shots 101:4	109:12 111:22
rid 82:9	8:22 72:8 75:8 93:9	shou 52:19	specifically 55:8 103:2
right 6:8 7:17	scan 3:1 69:15	show 44:12	specifics 114:16
9:8 10:1, 9 12:14	scams 60:6 62:4, 8, 16	showers 53:5	spell 6:19 68:10
14:21 17:20 18:6	Schiff 2:8	siblings 25:17 28:4	spelled 20:4, 4
19:1, 7, 9, 20, 23 20:2	school 100:7	side 12:23 84:3	spelling 56:8
12, 14 21:2 23:15, 18	scientist 92:24	sign 118:8	spent 89:14
21, 25, 25 24:1, 11, 12	Scouts 83:14 93:9, 17	signature 19:6	spoke 95:11 101:15
27:23, 25 28:11 30:18	screening 57:4	signed 20:14 86:11	114:4, 13
18 31:13 32:4, 11	screens 14:18, 19	116:12	spoken 94:7 95:8
9, 13, 19 34:14 38:5	sealed 102:20	significant 21:6	107:17 114:8, 11
40:4 42:21, 23 43:1	seasonal 100:7	signs 70:18	spot 110:13
44:13 49:8 51:15	second 39:18 40:18	sills 10:17 14:17	sprayed 113:7
12 53:17 54:3 56:2	55:4 66:6 99:1	similar 56:8	St 82:19 92:20
58:25 62:3, 5, 6, 12, 14,	secondhand 102:12	single 13:20	stack 80:17
16 63:2, 10, 10, 12, 25	secretarial 8:1	Sir 7:11	stacks 16:6
65:4 67:12, 13 68:1	section 66:19 68:8	sister 25:24 27:22	staff 71:23
69:5 70:7 74:11, 25	8 69:10 70:1 91:13	sit 88:18	Stage 67:8
75:12 76:5, 8 78:1	Security 34:16, 21	site 24:7 46:18	Staggs 78:18
80:18 81:2, 6 82:10	see 12:14 13:1	14:978:4	stand 75:16 110:8
83:24 84:23 85:8	90:14 6:9 37:20 68:19,	25	standing 58:19
86:13, 18 87:22	99:22, 5, 10, 12 70:9	sitting 78:7	stapled 85:8
18, 22 93:3 98:5	110:173:13 77:6 80:15,	six 22:19 29:25	start 7:19 22:16, 17
104:7 108:4, 20	115:5 85:5, 11 113:2	37:13 62:12 63:15	58:5, 8 66:23 74:7, 13,
113:17 114:24	SEEHAFFER 1:8 97:4	69:13 101:23	22 88:6
116:21	seeing 70:16 82:13	skin 28:5	started 8:25 31:19
ring 40:23 94:11	83:25 84:6, 10	skip 27:9 66:12	54:13 55:19 58:16
rip 42:8, 9, 19	seen 18:22, 25 35:2	sleep 21:14	59:10 61:18 64:16
ripped 115:19	38:11 39:5 69:4	78:6,	

70:20	73:7, 24	100:7	62:4	70:6, 12	testing	71:25	74:4	times	10:25	11:17
109:12				supplementary	1:17	81:11, 17		18:13, 15	43:16	48:19
Starting	45:14	56:18	supposedly	65:2	115:12	Texas	2:19	53:17	67:20	75:24
64:21	68:2	82:3	su88:1	6:14	20:20	Thank	24:17	45:15	88:19	
starts	72:7		35:1	41:19, 22	42:14, 61:11		66:22	94:1	tired	0:4, 21:12, 24
State	1:18	5:18	37:9	43:3	45:7	49:24	114:24		67:25	68:5, 25
72:8, 10	107:13	118:15	1:8	53:20	56:7	the	104:25	tires	109:3	
5, 21			71:7	85:21	90:24	therapeutic	100:25	tiring	21:20	
statement	64:14	87:9, 29	2:10	97:23	104:2	therapy	43:25	titled	18:23	
STATES	1:1	5:11	107:15	111:25	112:3	thereabout	1:17	3:19	titles	101:2
stationed	36:24		115:4	116:3		thereof			tobacco	113:20
stay	60:22	113:14	surgery	58:20		thereto	1:17	today	15:9	22:11
stayed	8:1, 7	37:12	surprising	66:25		thing	22:6, 9	28:14	103:10	112:17
step	106:22		surveillance	54:6			32:24	37:15	41:13	today's
stepped	101:11		swear	6:6			47:18	58:21	66:7, 1	told
Stetsonville	27:16		swelling	68:18			85:2	89:23		88:4
sticker	66:9		swollen	68:12		things	15:21, 25	16:4	tolerance	73:15
stipulate	99:8		sworn	6:9, 16	118:7		21:9, 9, 15	25:3	31:1	tolerated
stomach	61:22	69:21	SYDOW	1:9	97:11		41:23	48:2	50:1, 3	top
73:23, 23, 24	74:18		symptoms	72:16	75:10		55:22	57:2	58:13	75:8
75:24			system	60:23	63:24		62:13	64:6	67:3	Tore
stop	68:2	88:6				8	82:9	85:22	88:1	totally
stopped	10:13	12:17	< T >			90:19				touch
15:14	62:15	91:23	table	37:17		think	9:4	19:12		tough
92:4	114:1		take	17:1	18:10	38:39	4	43:10, 11	44:9	tour
store	96:15		23	53:25	64:4	66:3, 46	20, 20	47:4	51:5	stoured
stored	17:15		72:3	84:19	92:1	56:7	66:4, 6, 10	67:2	80:6	town
straight	82:24	83:1	taken	1:16	5:8	22:17	71:1	76:23	77:6	tracks
straighten	55:2		57:18	64:10	118:9	1079:15	80:5	90:3, 3	91:1	Trade
strap	112:18		talk	20:18	42:7	44:93	1	99:2	102:9, 9	training
straps	112:19, 21, 24		19, 24	45:4, 23	47:6	22 108:19	112:16	115:70	101:18, 21, 22	37:8,
Stratford	8:8	9:18, 21	48:15	49:10	78:23	116:25				103:1
23	29:24	30:8, 16	talked	41:21	52:12, 13	third	39:18	72:7		transcript
4	41:7	42:21	43:13	95:7		Thompson	2:18		94:18	8, 10
46:24	79:22	80:1	talking	11:13	16:22	Thorne	76:7		transcription	118:11
91:9			50:8	53:19	107:23	thought	15:2	37:23	travel	21:23
Street	2:14, 19	11:14	tall	61:17		40:24	55:11	62:13	treat	59:16
13:12	17:23	18:14	tape	13:10		65:13	71:20	73:3	treated	67:10
28:25, 25	33:5, 14, 17,		Tardy	2:13		93:7	106:19		74:8	
23	34:6	40:8, 18	take-out	110:10, 14		three	11:17	13:15, 15	77:4	
52:25	90:23		111:13			18:15	21:8	51:21	70:5	74:23, 23
strictly	97:9		tech	101:2		53:16	59:18, 19, 25	64:20	70:13, 13	74:13
stuff	48:23	57:25	tedious	95:14		60:6, 15	62:5	64:20	70:13, 13	74:13
102:17	110:18	114:4	telephonically	2:9		69:13, 22	70:14	73:1	tremendously	22:1
Stuffy	91:18		tell	10:19	22:15	73:5	75:22	85:23	Teutel	96:4, 7
subjects	20:18		25:5, 19	28:13	34:15	112:21			trick	86:22
subscribed	118:17		35:1, 3, 14	45:25	47:15	throat	55:12		trim	42:8
Subsection	34:14	87:21	50:8, 9	54:12	60:16	throat-clearing	55:19		42:8	47:18
substance	101:21		70:21	74:24	78:19	throw	77:17		73:25	
substantial	118:14		88:2	91:17	95:21, 2	thumb	38:23		44:23	
success	25:15		96:6, 22	102:12	114:4	Thursday	76:23		31:6, 8, 12	
successful	28:2		telling	7:20	64:4	time	7:20	8:12, 13	45:5, 21	46:8
sudden	76:18		ten	15:19, 23	73:13, 17	13:22	18:11	21:6	48:2, 5	84:14, 17
suggest	105:11		109:14	114:1		10	38:16, 23	46:2	101:18	102:21
suggested	106:2		tendency	118:14		50:23	53:13	54:15	36:2, 4, 5	46:12
Suite	2:9, 14		tenon	44:15		55:5	64:9, 12, 25	68:1	67:9	91:9
Sulzer	35:3		tenoner	44:15		75:11	76:3	77:25	91:9	118:10
Summary	3:15	89:24	terms	13:5, 8, 23	16:27	85:24	86:7	89:14	98:17	
summer	36:23	48:22	21:6, 10			91:1	92:7, 10	99:5	118:7, 7, 7	
Sunday	77:3		testified	6:16	72:15	101:11, 16	103:8		24:7	42:24
supervision	118:11		81:22	84:24		110:19	113:24	116:6	77:9, 15	86:21, 22
supplemental	60:7, 13		testify	118:7		117:3	118:9		75:3	87:3, 20
									twice	58:6
									60:10	62:10
									69:6	109:16, 17
									twill	53:2

two	9:20	11:12, 17	version	19:6	20:5	246:15	111:24	118:13	11	
17:25	18:15	21:8	versus	5:9		Wayne	76:7		wide	111:4
30:1, 1	36:22	37:7	VIDEO	1:13, 14	2:23	ways	87:17		wife	72:8 96:10 97:14
40:13	51:21	53:16	5:7			weak	75:17		wind	13:24, 25 14:2
60:5, 7, 14, 15	62:3, 6		videographer	2:21	5:5	wear	52:23	57:12	Window	14:17 77:20
72:12, 17	73:13	75:22	6:2, 5, 12	61:7, 10		103:17, 22	111:12, 20		windows	10:16, 17
76:19	88:1, 2	89:18	64:8, 11	117:2		113:5, 13				13:18 14:17, 19 47:19,
91:15	100:18	110:2	view	80:21		wearing	58:5, 8	20	109:10, 16	110:8, 11
112:18	113:6		visit	43:21	63:16	wedding	22:18	23:1	windshield	14:9, 12
two-car	51:19		visited	68:4		73:1			windy	14:18
two-week	77:20		visits	56:17		week	11:17	18:15	WISCONSIN	1:1, 18, 19
type	23:15, 25	46:11	Volume	5:6		53:17	73:20	74:14,	205:12, 13, 16	6:24 7:24
53:1	103:1, 14	104:1	volunteer	101:7		83:11			8:8	19:19, 24 26:1
16, 19	111:12	112:8				weekend	23:7	77:5	27:16	30:11 37:1
typed	20:4	86:1, 10	< W >			weekends	46:1, 5		107:15	118:1, 5, 21
typed-up	86:15		W.D	1:4, 5, 6, 7, 8, 9, 10,		weeks	22:20	36:22	witness	6:6, 9, 10 24:15,
types	47:1	103:21	11			37:7, 10	59:18, 25		17	25:4 31:4, 7, 11, 14
< U >			wa	103:6		70:14	72:12	73:14	38:14, 17, 20	39:10, 13
Uh-huh	16:9	27:1	Wacker	2:9		76:19	85:21, 23	101:25	59:4	61:9, 12 79:7, 17,
48:12	50:16	56:11	wall	20:1 18:9	31:2	weight	61:3		20	86:4, 16, 18, 20, 23
57:22	61:25	62:11	Walgreens	29:2		welcome	61:12	99:7	87:1	89:13 92:22 94:1,
67:9	69:18	74:1, 17	walk	31:22	32:5	Well,	10:7	11:12	121:15	95:3, 8 99:6, 10
75:15	84:22	87:7	16	89:775:14		13:25	16:11	22:18,	105:19	115:1 118:16
92:6	98:12		walked	52:6, 7, 8		23:6, 9	29:24	30:16	118:1	118:1
ultimately	87:25		walker	75:14		32:17	33:1	36:1, 6	word	70:10
uncle	96:8		walks	88:25		41:1	44:25	48:5	would	102:15 105:24
uncomfortable	73:16		wall	111:6	113:7	21	52:1	57:1	60:18	52:22, 23, 25 58:3
understand	68:12		wall-removal	110:20		62:16, 25	67:25	69:22	103:14	112:4
understanding	7:7		walls	50:22	109:18,	23, 70:14	72:25	73:4,	8work	12:5, 10 16:25
101:20	102:18, 22		25	110:14	111:2, 6	76:4	81:24	83:3	85:8	26:20 27:14
107:16			115:19, 20			88:4	90:12	96:9, 11	41:25	42:2 49:13
uniform	53:1, 3		Wally	95:19		99:13	104:21	110:6	50:17	52:13, 16, 22, 23
union	43:7, 9		want	18:16	20:18	2114:19	113:10		58:19	64:7, 16 100:1
Unit	5:7		23, 23	31:7, 11	34:16	well-being	21:11		101:8	108:20, 24
UNITED	1:1	5:10	38:10	39:1	66:2, 8,	went	8:6	23:7	25:1	109:11 111:13
units	8:10		68:3	69:2	71:7	825:20	36:10	48:3	worked	8:12 14:24
unknown	23:15	75:10	101:17			56:23	58:1	59:17	200:12,	17, 18 27:14, 18
unusual	60:19	61:6	wanted	22:15	47:25	7	67:22	68:21	71:22	28:1 42:1, 17, 17, 18
updated	50:23	109:9	48:3, 13	53:20	64:19	94	74:4, 20	76:2	1123:18	44:5 47:17 51:3
upper	80:16		69:12	87:9		we're	25:2	27:9	54:53:13	55:6 83:14 97:7,
upstairs	17:9, 19	18:1	warning	103:1		59:11, 11, 11	64:5, 8		14	100:8, 16, 25 101:1
110:24			washed	53:5		65:16	66:12, 13	78:23	104:17	108:16
Urban	3:15	7:3	washer	17:3		85:1	95:14	116:25	workers	113:5
10:10	19:18	26:5,	washing	11:23	12:1,	Wes	97:11		worker's	57:15 98:21
27:8, 8	97:8	102:8	16:22	17:5		west	82:25	100:17	working	8:23 16:4
Urban's	16:22	38:11	Washington	8:7	30:1	WESTERN	1:1	5:11	56:20	58:9 103:10
use	18:16	92:7	1033586, 10	37:2, 3, 13		we've	7:17	8:17	works	29:2, 13 31:16,
111:16			64:17			WEYERHAEUSER	1:1,		18, 19	
usually	10:13	14:4	waste	45:20	46:11	5, 47:2, 8, 9	2:12	3:13	worn	112:8
17:1	50:24	52:25	84:1, 6, 10	91:1, 5		5:9	6:1	8:13, 23	would	22:4, 4 76:22
83:13	88:12		102:4, 7, 19	110:17		15:5	16:12	18:23	worst	91:18
< V >			water	12:6, 8	35:17	24:21	26:14	27:2	worth	44:11
VA	63:17, 20	71:19	72:23			38:12	49:14	57:10,	write-ups	82:14
73:20			Watkins	2:13		64:17	84:1, 6, 6, 10		wrong	66:5, 7, 11 85:1
value	97:24	98:4	WATSON	2:8	6:3, 3	90:25	99:20		< X >	
various	93:18		Wausau	7:25	30:9	wheeze	55:14		x-rayed	60:10
Vaughan	2:4		32:15, 22	40:12	42:1	WHEREOF	118:16		x-rays	54:10 62:7
vehicle	14:8		43:12	79:1, 11, 17		white	11:4, 8	60:21	104:21	105:6
vehicles	14:6		way	15:5	23:3	47:261:1	112:16		< Y >	
verbatim	56:6		50:1, 25	73:8	85:7	white-ish	11:4			
			102:23	104:11	108:1	WI	1:4, 5, 6, 7, 8, 9, 10,			

Yeah 6:14 15:22 21:4
 29:19 33:3, 21 42:24,
 25 47:21 49:3, 19, 19
 56:11 57:7 73:18
 76:17 79:20 80:10, 19,
 23 86:19, 21 89:9
 92:22 95:8 98:3 99:13,
 25 103:23 111:15
 112:16
year 8:7 9:19 36:25
 37:7 45:11 60:4, 5, 10
 62:10 68:22 69:7
 101:12 109:13
yearly 71:20
years 8:2, 11, 15, 17
 9:12, 20 15:19 21:8
 22:20 28:2 30:1, 6
 31:21 34:13 37:13
 40:13 44:11 46:5, 23
 50:19 52:3 55:20, 20
 58:17 59:9 60:7, 14, 15
 62:3, 6 72:17 88:1, 3, 8
 100:10, 16, 18 109:14,
 14 114:1
Yep 28:10 37:5 62:6
 101:22
yesterday 19:7
York 106:15

< Z >
zero 60:21, 24 61:2